

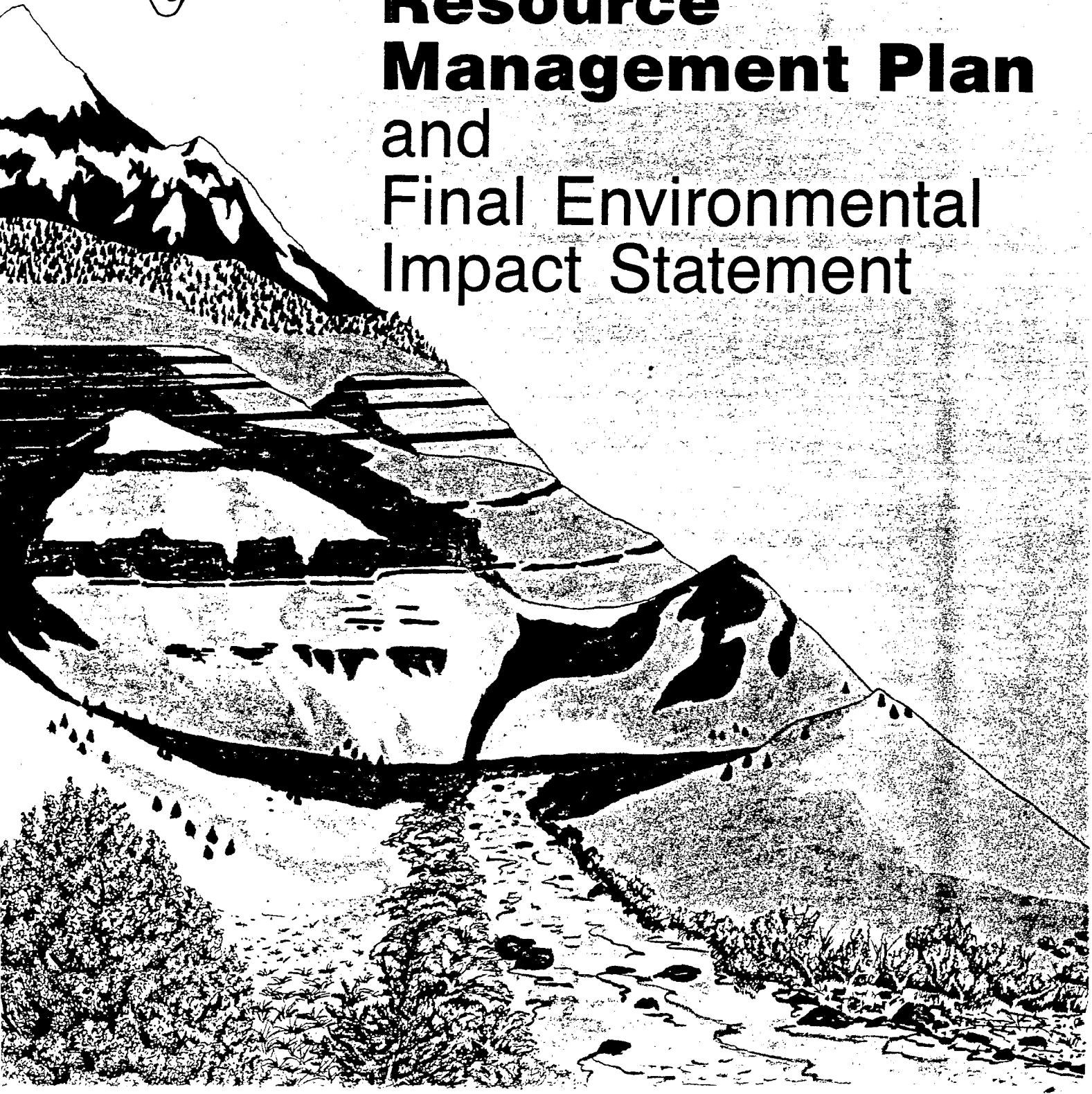


U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management

Burns District Office
74 S. Alvord Street
Burns, Oregon 97220

ONRC Action v. Bureau of Land Management
Civil Case No. 96-00422-HA
Administrative Record 30C

Proposed John Day Resource Management Plan and Final Environmental Impact Statement



Administrative Record
Case 1:03-cv-00455-HV
CNBC Action v. Bureau of Land Management



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Burns District Office

74 South Alvord, Burns, OK 97720

November 14, 1984

Dear Reader:

Enclosed for your review and comment is the John Day proposed Resource Management Plan and final Environmental Impact Statement for the John Day Planning Area, Burns District, Oregon. The Bureau of Land Management has prepared this document in partial fulfillment of its responsibilities under the Federal Land Policy and Management Act of 1976 and the National Environmental Policy Act of 1969.

The proposed RMP and final EIS is published in an abbreviated format and is designed to be used in conjunction with the Draft RMP/EIS published in June of 1984. Additional copies of the Draft RMP/EIS are available upon request from Bureau of Land Management, 74 South Alvord, Burns, Oregon 97720.

This proposed RMP and final EIS contains a summary from the draft, introduction, the proposed plan, text revisions to the Draft RMP/EIS, public comments received on the draft, and the Bureau's response to these comments.

If you wish to comment for the District Manager's consideration in the development of the decision, please submit your comments to the District Manager by December 31, 1984. Your comments should be sent to:

District Manager
74 South Alvord
Burns, Oregon 97720

The plan decisions will be based on the analysis contained in the EIS, any additional data available, public opinion, management feasibility, policy and legal constraints. The approval of the plan will be documented in a record of decision, which will be available to the public.

The proposed plan cannot be approved until after the Governor of Oregon has had an opportunity to review it to identify any-inconsistencies and provide recommendations in writing. Approval of the plan will also be subject to the final action on any protest that may be filed. Protests must conform to the requirements of Title 43 of the Code of Federal Regulations, Subpart 1610.5-2 and be filed with the Director of the Bureau of Land Management.

Thank you for your interest and participation.

Sincerely yours,


Joshua L. Warburton
District Manager

Proposed John Day Resource Management Plan and Final Environmental Impact Statement

Prepared By
BURNS DISTRICT OFFICE
BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF THE INTERIOR
1984



State Director, Oregon State Office



District Manager, Burns District

Proposed John Day Resource Management Plan and Final Environmental Impact Statement for the John Day Planning Area, Three Rivers Resource Area, Burns District, Oregon

Draft () Final (X) RMP/EIS
Responsible Agency:
Department of the Interior, Bureau
of Land Management

1. Type of Action: Administrative (X) Legislative ()

2. Abstract: This proposed resource management plan (RMP) and final environmental impact statement (EIS), when combined with the draft statement, describes and analyzes four alternatives for managing 182,120 acres of public land and resources within the John Day Planning Area, Burns District. Those alternatives are: Alternative A, Preferred; Alternative B, Emphasis on Production of Commodities; Alternative C, Emphasis on Enhancement of Natural Resources; Alternative D, No Action (continuation of the existing land management program).

Implementation of the proposed plan includes allocation of forest resources, vegetation to livestock, wildlife and wild horses, 5,240 acres of public land for disposal. This proposed plan provides for protection of cultural, soil, water, botanical and recreational resources, aquatic and riparian habitats, and big, small, and nongame habitats. This proposed plan provides for the orderly development of renewable and nonrenewable resources.

3. The public review and protest period will end December 31, 1984. The draft RMP/EIS was made available to the EPA and the public on June 14, 1984.

4. For further information contact:

Malcolm T. (Bud) Shrode, Area Manager
Bureau of Land Management
Burns District Office
74 South Alvord
Burns, Oregon 97720
Telephone (503) 573-5241

SUMMARY

Four multiple use alternatives for the management of public lands in the John Day Planning Area have been developed and analyzed in accordance with the Bureau's planning regulations issued under authority of the Federal Land Policy and Management Act of 1976. The alternatives respond to three major issues which were identified through the planning process: Forest Management, Forage Use and Land Ownership Adjustment. The purpose of the proposed alternatives is to present and evaluate options for managing, protecting and enhancing public resources.

Each alternative is a master plan that would provide a framework within which future, more site-specific decisions would be made, such as defining the intensity of management of various resources, developing activity plans (e.g., grazing allotment management plans and transportation plans) or issuing rights-of-way, leases or permits.

The four alternatives considered are:

A. Preferred Alternative

The Preferred Alternative would emphasize the management, production, and use of renewable resources on the majority of the public lands in the John Day RMP area. Management would be directed toward providing a flow of renewable resources from the public lands on a sustained yield basis. This alternative represents the Bureau's favored management approach.

Grazing permits would be authorized at the 1982 total preference level of 25,323 AUMs. There would be 14 management systems developed, maintained or revised for I category allotments which comprise 47 percent of the grazing lands and 51 percent of the total preference AUMs.

There would be 30,962 acres of commercial forestland on which the sustained harvest level is based. The sustainable harvest level would be approximately 2.17 MMbf annually or 21.7 MMbf for a ten-year period. Minor forest products would be sold where consistent with other resource values.

Forage availability for wildlife and wild horses would continue at current levels except for bighorn sheep. The wild horse Herd Management Area (HMA) would be reduced in size, but the planned herd size would remain at 100 animals. Livestock grazing adjacent to 28.7 stream miles in Improve category

allotments would be coordinated to enhance fish habitats. Vegetation manipulation and implementation of water developments would occur to improve fish and wildlife habitat, primarily big game habitat. Instream structures would be developed along 55 miles of stream supporting anadromous fisheries. A fish ladder would be constructed to open up 85 miles of streams to anadromous fish.

There would be 5,240 acres identified for disposal through sales with an additional 16,000 acres identified for further study. Exchanges and transfers to other federal agencies would take place when natural resource values would benefit.

B. Emphasize Production of Commodities Alternative

This alternative would emphasize providing economic benefits to the local economy. Multiple use management would emphasize the production of goods and services on public lands within the John Day RMP area to meet local and possibly regional demands.

On grazing permits with I category allotments there would be a slight increase in authorized grazing use. Livestock grazing would be allowed throughout the planning area but grazing use within I category allotments would be managed according to activity plans.

There would be 31,609 acres of commercial forestland on which the sustainable timber harvest level is based. The sustainable harvest level would be 2.21 MMbf annually or 22.1 MMbf for the decade. The sale of minor forest products would be optimized.

Forage use for wildlife would continue at current levels except for bighorn sheep. Wild horse use on public land would be reduced or excluded focusing horse use in normal years on National Forestlands. A wild horse winter use area would be established for use in hard winters. There would be construction and development of fresh water impoundments to provide cold and warm water fisheries.

There would be 21,014 acres identified for disposal through sales with an additional 16,000 acres identified for further study. Exchange and transfers to other federal agencies would take place when natural resource values would benefit.

C. Emphasize Enhancement of Natural Resources Alternatives

This alternative would emphasize protection, maintenance and enhancement of the natural environment within the planning area. The enjoyment and use of the natural environment for present and future generations, both locally and nationally, would be emphasized.

On grazing permits within I category allotments there would be a 25 percent decrease in livestock use over the short term. An additional decrease in livestock use would occur over time as wild horse use increases. Range developments would be implemented where appropriate to meet other resource needs. Livestock grazing would be restricted or excluded from 76 miles of streamside riparian zone through management of fencing of affected allotments.

There would be 18,867 acres of commercial forestland on which the sustainable timber harvest level is based. The sustainable harvest level would be 1.32 MMbf annually or 13.2 MMbf for the decade. Multiple use constraints and set-asides would be expanded. Old growth values would be preserved. Sales of woodland products would be restricted to protect other resource values.

Forage availability to wildlife would continue at current levels in the short term except for bighorn sheep. Forage used by wild horses would receive a maximum increase to 5,061 AUMs over time and the HMA would remain at present size. Livestock grazing would be restricted or excluded from 76 streamside miles of riparian zone through management or fencing of affected allotments. Instream structures would be developed in 55 miles of stream supporting anadromous fisheries. A fish ladder would be constructed to open up 85 miles of streams to anadromous fish.

Under this alternative no lands would be identified for sales. Ownership adjustments would function through an active exchange program that would emphasize protection, maintenance and enhancement of the natural environment.

D. No Action Alternative

This alternative allows for the management and flow of outputs from the public lands and resources in the planning area at their present levels. The planning area is presently operating under a 1974 Management Framework Plan (MFP) and formal management direction is derived from the MFP with on-the-ground actions following an interdisciplinary analysis process.

Grazing permits would continue to be used at the 1982 total preference level of 25,323 AUMs. Activity plans would be maintained or revised as needed. Constraints upon the grazing program would be minimal and primarily would be reflected in implementation of activity plans. Riparian restrictions would be based upon previously proposed or existing pastures and existing exclosures.

There would be 31,433 acres of commercial forestlands on which the sustainable harvest level is based. The annual sustainable harvest level would be 2.20 MMbf or 22.0 MMbf for the decade. Woodland products would be utilized based upon demand.

Forage availability to wildlife and wild horses would continue at current levels. Constraints on timber harvesting to protect big game habitat would be based on existing constraints and set-asides. Wildlife developments would be implemented for big game and fish habitat.

There would be 36,779 acres identified for disposal through sales and no acres have been identified for further study.

Environmental Consequences

Air Quality

Under all alternatives, impacts from particulate matter and visible smoke resulting from all activities would be very minor and temporary, and thus are not considered significant.

Soils

There would be a low beneficial impact under the Preferred, Production and Enhancement Alternatives due to the increase in the proportion of residual ground cover composed of perennial vegetation. The No Action Alternative would result in no change from the existing situation.

Road construction and timber harvest techniques can create soil compaction, soil disturbance and soil loss but they would be in proportion to the number of acres harvested. Adverse impacts to soil would be greatest under the Production, No Action and Preferred Alternatives and least under the Enhancement Alternative.

**Table 1 Comparison of
Alternatives: Summary of
Allocations/Outputs by Issue**

Issue	Unit of Measure	Alt. A Preferred	Alt. B Production	Alt. C Enhancement	Alt. D No Action
Forest Management					
Total Commercial					
Forest Set Aside	acres	1,828	1,451	8,072	1,532
Yield ⁴	MMbf	2.17	2.21	1.32	2.20 ⁵
Forage Allocation					
Riparian Habitat Management					
Improved Riparian Habitat	Miles	28.5	28.5	76.0	28.5
Short Term					
Livestock Forage New/Revised	AUMs	25,323	25,872	21,023	25,323
AMPs/CRMPs	No.	14	14	14	2
Range Improvement Costs	\$	431,220	470,000	183,000	91,000
Big Game Forage ¹	AUMs	500	500	500	500
Wild Horse Forage ¹	AUMs	240	-0-	5,301	240
Bighorn Sheep	AUMs	192	192	192	96
New/Revised Activity Plans (Wildlife, Wild Horses, Forestry)		11	11	11	3
Long Term					
Livestock Forage ³	AUMs	25,734	27,381	21,023	25,323
Big Game Forage	AUMs	500	500	500	500
Wild Horses	AUMs	240	-0-	5,301	240
Bighorn Sheep	AUMs	360	360	360	360
Land Ownership Adjustments (By Sale)					
Disposal Category	Public				
Acres		5,240	21,014	-0-	36,779
Further Study	Public				
Acres		16,000 ²	16,000 ²	-0-	-0-

¹ Forage here meant to mean competitive forage on I category allotments.

² An additional 18,000 acres may be available depending on a case by case analysis of significant big game habitat and forestry considerations.

³ Long-term forage increases would occur on I category allotments only.

⁴ Yield is approximate, an accurate harvest yield will not be determined until FY 85.

⁵ This allocation reflects current information and is substantially lower than the existing situation of 48,818 acres forestland with a planned harvest level of 3.4 MMbf.

Water

No significant change in the quantity of runoff would occur under any of the alternatives. Road construction and logging would cause localized increases in sediment yield under all alternatives, but most significantly under the Preferred, Production and No Action Alternatives. Overall sediment yield related to timber harvest would decline under all alternatives.

Sediment yield caused by grazing management activities would decrease under all alternatives and there would be no change under the No Action Alternative.

Vegetation

Under the Preferred, Production and Enhancement Alternatives range condition would improve and total residual ground cover would decrease. The No Action Alternative would maintain range conditions. There would be significant increases in woody key species on poor and fair condition riparian areas under the Preferred and Enhancement Alternatives with increases being the greater under the Enhancement Alternative. The No Action and Production Alternatives would result in decreases in woody species in these areas.

Alterations to plant community structure and longevity would be the most significant impacts to vegetation on forestlands scheduled for timber harvest. Acres proposed for timber harvest over the next ten years would range from 6,027 under the Enhancement Alternative to 10,090 under the Production Alternative. Except in the Enhancement Alternative, mature and old growth forest communities would be converted to early successional stage communities as slow-growing timber stands are replaced by young, fast growing stands. Changes in plant communities and habitat could alter species composition.

There are no listed threatened and endangered plants within the planning area. However, those plants under review would be protected from impacts of construction through standard operating procedures and design elements.

Wild Horses

Wild horses would remain at a maximum of 100 head within the HMA in the Preferred and No Action Alternatives. Wild horse use would be reduced or excluded on public lands, focusing horse use on National Forestlands, in the

Production Alternative. The wild horse population would increase to a maximum 522 head within the existing HMA in the Enhancement Alternative. The Preferred and Production Alternatives would reduce the size of the HMA on public lands.

Wildlife

The Preferred and No Action Alternatives would maintain existing mule deer populations. The Enhancement Alternative would support an increase in deer populations while the Production Alternative would result in a decrease in deer populations. The Preferred and No Action Alternatives would maintain existing elk populations. The Production Alternative would result in a moderate decrease in elk population, while the Enhancement Alternative would result in a high increase in elk population. None of the alternatives would significantly effect other upland species. Wetland species populations would increase under the Preferred and Enhancement Alternatives, but would be adversely affected under the Production Alternative and would be maintained under the No Action Alternative. Riparian species populations would increase under the Enhancement Alternative and to a lesser degree under the Preferred Alternative. The No Action Alternative would maintain those riparian species populations while the Production Alternative would result in moderate decrease populations.

Overall game fish populations would increase under all alternatives. Under the Preferred, Production and No Action Alternatives, this would be due to instream fish habitat improvements and expansion of steelhead and flat water habitat. The largest increases would be realized under the Enhancement Alternative as a result of restrictive grazing management in riparian zones.

Recreation

Net recreation use would increase as projected under all alternatives. Motorized use would continue to occur randomly throughout most of the resource area. Use would continue to be relatively light in most areas, with heavier use occurring in specific places close to urban areas such as John Day and Canyon City. Other recreational activities would increase at the present rate. Visitor use reductions would tend to balance increases in visitor use in activities beneficially impacted. Areawide projected use for public land in the planning area would show approximately 22 percent increase over existing levels for a total of about 44,000 visitor days on public lands by 1997 under all alternatives.

Visual Resources

Certain portions of the planning area may experience slight short-term degradation of visual quality under all alternatives. Project specific design features, as well as VRM program procedures and constraints, would minimize landform and vegetative contrast. In the long term, visual quality would improve as programs are implemented.

Cultural Resources

Appropriate measures would be taken to identify and protect cultural sites prior to ground-disturbing activities. No impacts would occur to known cultural site of significance.

Mineral Resources

Mineral extraction would result in an irreversible or irretrievable loss of mineral resources from their natural place in the environment. The impact would tend to occur in small, localized areas within the planning area and the loss of mineral resources through sound exploration, extraction and reclamation activities is considered to be a beneficial impact rather than adverse impact.

Economics

In the short term, under the Preferred Alternative, local income would decrease, but local employment would be unchanged. Under the Production Alternative, income would increase, but employment would be unchanged. Both income and employment would decrease under the Enhancement and No Action Alternative. In the long term, both income and employment would decrease in the local area under all alternatives.

Comparison of Impacts

This section compares in tabular form (Table 2) the impacts of each alternative. While impacts are described in detail in Chapter 4, Table 2 is presented to assist decisionmakers and reviewers by summarizing the impacts of each alternative.

Table 2 Comparison of Alternatives: Environmental Consequences

Resource	Unit of Measure	Existing Situation	Alternatives			
			A Preferred	B Production	C Enhancement	D 'No Action
Loss in Soil Productivity						
Timber Harvest ¹			+L	+L	+M	+L
Livestock Grazing ²			+L	+L	+L	NC
Water (Sediment Yield)						
Timber Harvest ¹			+L	+L	+M	+L
Livestock Grazing ²			+L	+L	+L	NC
Vegetation						
Riparian Condition ²			+L	+L	+M	NC
Range Condition ³			+L	+L	+L	NC
Forage Production ³	(1000 AUMs)	8.2	8.6	10.3	3.9	8.2
Disturbance from range improvements ⁴	(acres)	0	41	41	18	5
Timber Harvest Level ⁵	(MMbf)	3.4	2.17	2.21	1.32	2.20
Wild Horses						
Herd size	(no.)	100	100	100	522	100
Size of MCHMA	(1000 acres)	143.1	90.9	90.9	143.1	143.1
Mule Deer			NC	-L	+L	NC
Elk			NC	-M	+H	NC
Other Upland Species			NC	NC	NC	NC
Wetland Species			+L	-M	+H	NC
Riparian Species			+L	-M	+H	NC
Fish Populations ⁶			+M	+L	+H	+M
Economic Conditions:						
Local personal income	(\$1000)	69,236.0	-48.5	-19.6	-282.0	-21.4
Local employment	(jobs)	3,429	-2	-1	-11	-2

+ = beneficial, - = adverse, NC = no change
 L = low, M = medium, H = high

¹ Major impacts are assumed to be proportional to the amount of timber harvest. (Table 2-1 and 2-2).

² 1 category allotments (Table 4-2).

³ From Table 4-1.

⁴ Permanent disturbance (Table 4-3).

⁵ From Table 2-1.

⁶ Resident rainbow trout and steelhead.

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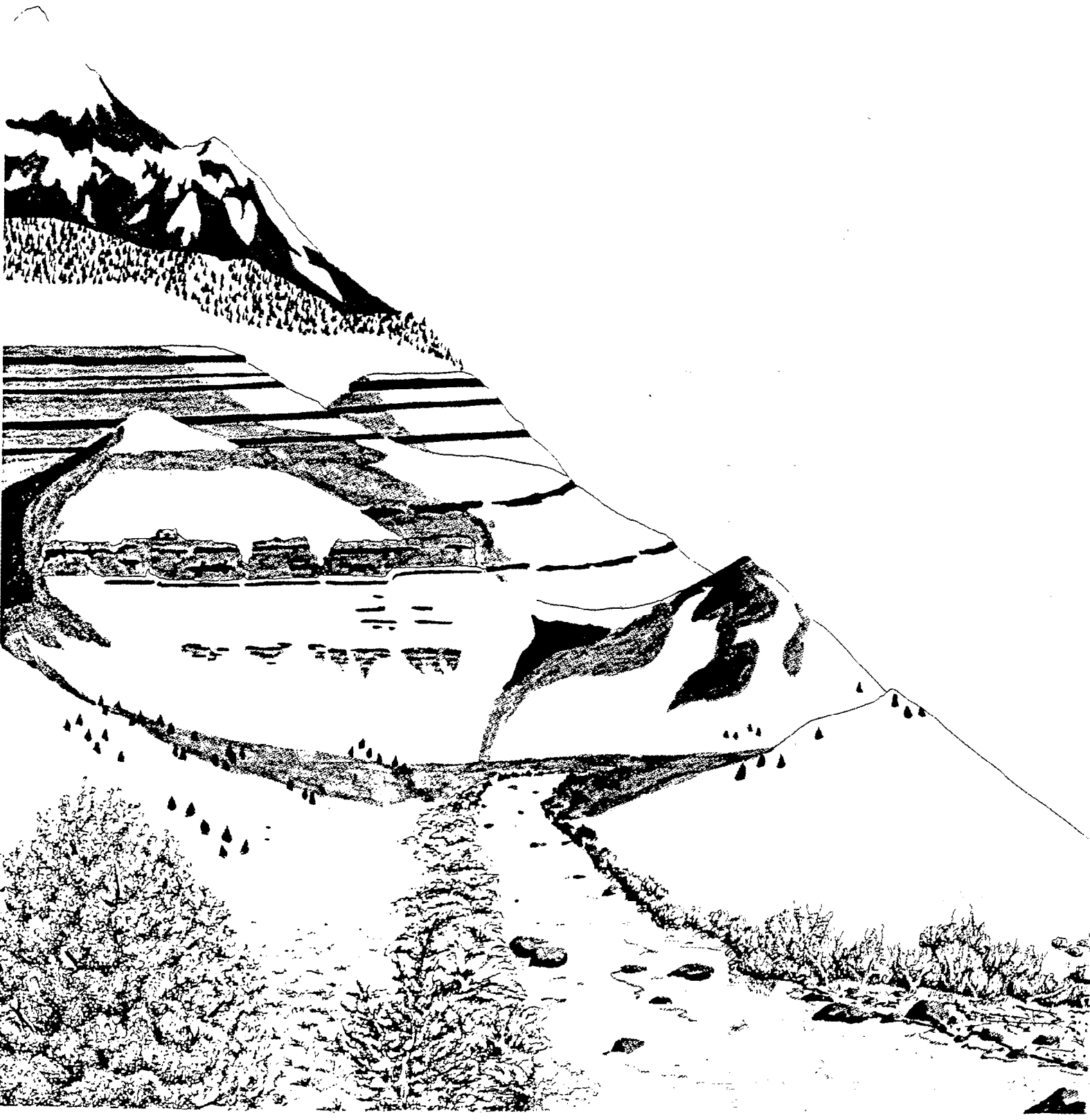
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Chapter 1

Purpose and Need for Action



Purpose and Need for Action

Under the authority of Section 202(f) of the Federal Land Policy and Management Act and Section 102(2)(C) of the National Environmental Policy Act, a process was initiated for the development, approval, maintenance, and amendment of resource management plans (RMPs) and their associated environmental impact statements (EISs). The process is guided by Bureau of Land Management (BLM) planning regulations found in Title 43 of the Code of Federal Regulations, Subpart 1600 (43 CFR 1600) and Council on Environmental Quality regulations found in 40 CFR 1500. The John Day RMP/EIS prepared in conformance with these laws and regulations, is presented in two volumes, the Draft RMP/EIS published in June of 1984 and this Proposed Resource Management Plan and Final Environmental Impact Statement.

The RMP/EIS is being completed for the John Day Planning Area of the Three Rivers Resource Area at this time for two reasons:

- 1) The existing management framework plan (MFP) is outdated and in need of revision. Preparation of the RMP and resolution of issues has been determined preferable to amendment of the MFP;
- 2) The John Day Planning Area was scheduled to complete a court-mandated grazing EIS, and it was decided that this would be more appropriately made a part of an RMP than done separately.

The John Day RMP has several objectives. It is designed to guide and control future management actions and the subsequent development of activity plans. The EIS portion analyzes the impacts of the management actions identified in the draft plan and the alternatives.

In addition, the RMP process stimulates participation by the public and agencies of the Federal, State, and local governments. It also makes use of the best available data and analyses of alternatives. All of this will improve the basis for resource management decisions for public lands in the John Day Planning--Area.

Planning Area and Issues

The John Day Planning Area (see Draft RMP/EIS, Maps 1 and 2), which is part of Oregon's Burns District, comprises those public lands within Grant County and a northern portion of Harney County.

The planning area is bordered on the north and east by the Vale District and on the west by the Prineville District. Public lands within the John Day Planning area tend to be scattered and isolated parcels.

Table 1-1 Surface Ownership - Land Ownership - John Day Planning Unit of the Three Rivers Resource Area

	Acres	% of Total
Federal (BLM Administered ¹)	182,120	6.1
Federal (USFS Administered)	1,671,035	55.5
Federal (Park Service Administered)	6,300	.2
State	27,447	.9
Private	1,120,993	37.3
Total	3,007,895	100.0

¹The Bureau administers an additional 178,000 acres subsurface ownership which does not include U.S. Forest Service lands.

The John Day Resource Management Plan Area (planning area) incorporates the John Day Planning Unit and those forestlands located in the Drewsey (4,143 acres) and Riley (4,442 acres) Planning Units. The RMP/EIS will address impacts and allocations of those forestlands within the Drewsey and Riley Planning Units. The Drewsey and Riley Planning Units are presently managed through existing planning documents that provide guidance for all resource programs. All management actions pertain to public lands administered by the Three Rivers Resource Area, except where specifically stated otherwise.

The contents of this RMP focus upon resolution of three main issues: Forest Management, Forage Use and Land Ownership Adjustment. These issues that encompass concerns identified by members of the public, other agencies, entities of State and local governments, and BLM staff are summarized as follows:

1) Forest Management

Special attention is needed to identify portions of the John Day RMP Area that are suitable for sustained yield production of forest and woodland products, and to assure that other important resource uses and values are adequately protected. Resource management consideration include deer, bighorn sheep, and elk habitat; sensitive recreation values and aesthetics; sensitive watershed; land ownership pattern; and important timber values.

2) Forage Use

Grazing Management

Management changes appear to be needed in some livestock allotments in order to reduce conflicts between livestock grazing and other important resource uses and values. Riparian habitat is considered especially important because of its relationship to watershed protection, water quality, fish habitat, and terrestrial wildlife habitat diversity. Inventory data indicates that 27 percent of the surveyed area is in early seral successional stage and provides poor watershed cover, excessive runoff and low forage production for both livestock and wildlife. Some areas within the planning area are covered with dense sagebrush and juniper. Improvement in range condition will be very slow without some reduction in brush and juniper cover. Uneven livestock distribution is evident on many allotments and results in heavy use of favored areas and minimal use elsewhere.

Wildlife and Fish Management

Public lands within the RMP Area provide key habitat for variety of wildlife species and this RMP identifies these crucial habitat areas. Livestock grazing management and range improvements may impact wildlife and fish habitat. Forest management and harvest techniques could impact wildlife and fish. Opportunities exist for improvement of wildlife and fish habitat through wildlife improvements, and range and forestry practices.

Wild Horse Management

The Bureau is concerned about the manageability of the Murderer's Creek wild horse herd. Public land comprises 24 percent of the Herd Management Area. Maintenance of the present management population level is a primary concern

3) Land Ownership Adjustment

Special attention is needed to identify those portions of the John Day Planning Area where land ownership adjustments are needed to achieve more efficient management and utilization of public resources. Adjustments include transfers, exchanges and sales. Principal considerations include public values, resource values current use, location proximity to land managed by other agencies, manageability, and compatibility with adjacent land uses.







MAP 1

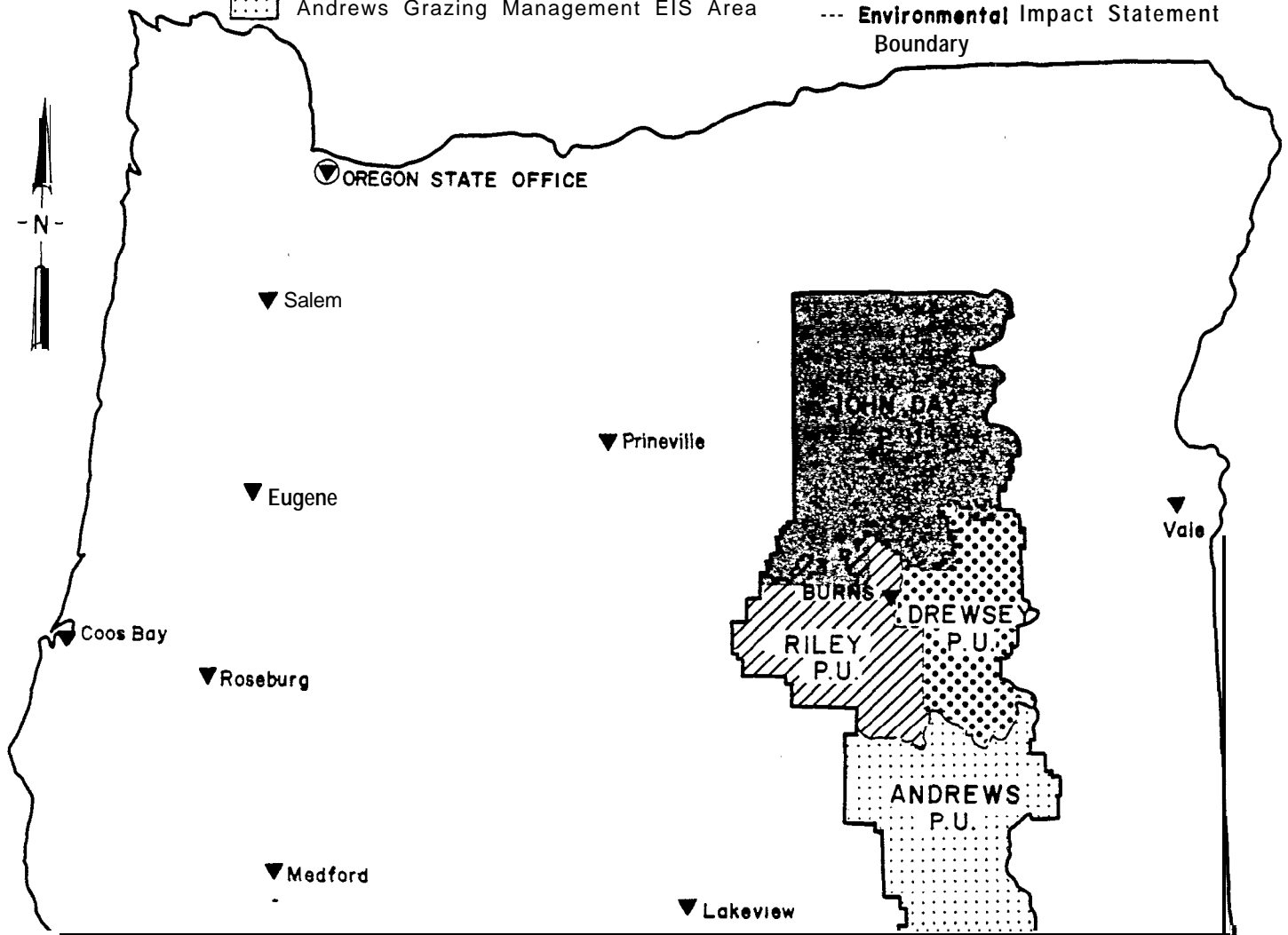
GENERAL LOCATION MAP

Burns District

Environmental Impact Statement Areas

Legend

- | | |
|---|---|
|  John Day Resource Management Plan/ EIS Area |  BLM State Office |
|  Riley Grazing Management EIS Area |  BLM District Office |
|  Drewsey Grazing Management EIS Area | - District Boundary |
|  Andrews Grazing Management EIS Area | -- Planning Unit Boundary |
| | --- Environmental Impact Statement Boundary |



OREGON

Chapter 2

Proposed Resource Management Plan



Proposed Resource Management Plan

Introduction

Chapter 2 describes the proposed plan, which provides a mid-ground or balance between the protection of fragile and unique resources and the production and development of renewable and nonrenewable resources. Management actions were selected on the basis of their ability to resolve the issues raised during the planning process, satisfies planning criteria and public input, and mitigate environmental consequences.

The proposed plan (proposed action) is patterned after the Preferred Alternative identified in the Draft John Day Resource Management Plan and Environmental Impact Statement (RMP/EIS). No significant changes have occurred in the plan.

Approval of the RMP will mark the completion of one stage of the planning process. The RMP is not a final implementation decision on actions which require further specific plans, process steps, or decisions under specific provisions of law and regulations. More site specific plans or activity plans, such as habitat management plans (HMPs) would be done through the resource activity programs. Procedures and methods for accomplishing the objectives of the RMP will be developed through the activity plan. Further environmental analyses would be conducted and additional engineering and other studies or project plans would be done if needed.

Goals and Objectives of the Proposed Plan

The overall goal of the proposed plan is emphasize production of livestock forage and other commodities while accommodating wildlife, recreation, visual resources, water quality and wild horses. The multiple use trade-offs between resources help maintain and protect big and nongame habitat, riparian and aquatic habitat, recreation use, cultural and botanical resources, esthetics, and wild horses.

Objectives:

1) Improve and maintain vegetative condition to benefit livestock and wildlife. Maintain all existing improvements and continue existing activity plans. In allotments where potential exists for resource improvement, implement management systems

and/or range improvements. Coordinate livestock use in riparian zones in order to protect water quality and enhance anadromous and other sport fisheries. Allocate additional competitive forage to livestock before wildlife wherever present big game population objectives are exceeded;

2) Enhance water quality and manage aquatic habitat with particular attention to those watershed with major downstream uses including native anadromous species, other sports fisheries, and agriculture;

3) Alter timber management practices on those forestlands critical to habitat management for the enhancement of wildlife, fisheries, wilderness, water quality, and recreation while obtaining sustained harvest level;

4) Manage upland habitat for diversity to provide for a variety of wildlife species:

5) Keep public lands and roads open for a variety of recreational uses;

6) Reduce existing Murderer's Creek Herd Management Area while maintaining wild horse numbers at current management levels;

7) Keep public lands open for exploration/development of mineral resources, rights-of-way and other public purposes:

8) Improve the Bureau's land base in John Day Planning Area for maximum public use or benefit through the transfer, exchange or sale of public lands.

Planned Management Actions Under the Proposed Plan

This section describes the planned actions, outlines what support would be needed, if any, and determines priorities for implementing the planned actions. The planned management actions would be used as a mechanism to resolve the planning issues displayed in the preferred alternative within the Draft RMP/EIS.

The priorities were established based on public demands, administration policy, and Department of the Interior and BLM directives. Therefore, these priorities may be revised as policy and directives change. The highest priority for each resource is maintaining its base.

This includes funding normal operating costs, completing administrative duties, and processing public inquiries. Priorities are situated into three categories - high, medium and low based upon comparative ranking of the management actions.

The listed support actions are foreseeable at this time. The need for additional support actions, such as engineering and other studies, or specific project plans may be identified as a result of further planning. All such actions would be designed to achieve the objectives of the RMP. Additional environmental analyses will be conducted where appropriate to supplement the analysis in the Draft RMP/EIS.

Forest Management

Manage 32,242 acres of commercial forestland within the 15 management units (see Draft RMP/EIS, Tables 2-1 and 2-2) for the commercial tree species and on a sustainable harvest level of 2.17 MMbf annually, or 21.7 MMbf per decade: Major commercial tree species include Ponderosa pine, Douglas fir, Grand fir, Lodgepole pine, Western larch, Engelmann spruce, and Western white pine. Manage woodlands for forest products when consistent with other resource uses.

Manage forestland to minimize losses or damage to commercial tree species from insects and disease. Develop road systems and manage or harvest commercial tree species as prescribed in Table 2-6 - Forest Management Direction and Appendix G - General Best Forest Management Practices (see Draft RMP/EIS).

Commercially thin within the timber sale boundaries. Pre-commercially thin approximately 200 acres per year. Dispose of slash concentrations in excess of 15 tons per acre while maintaining 12 tons per acre for nutrient replacement. Allow disposal of slash and standing dead material through a fuelwood program.

support

Cadastral survey and some engineering support will be needed to aid design and layout of timber sales and access roads: Timber sale plan is updated annually to reflect changes in direction and resource data. Develop timber management and woodland management plans. Fire management

support will be needed for management of natural fire in meeting forest management resource objectives. Acquisition of legal access to public land will be needed to open areas to commercial forestland management. Acquisition of legal access to public land to open areas for fuelwood will only be pursued if the access also benefits other resource values.

Implementation and Monitoring

Activity plans will define the resources for the planning area, state specific management objectives, specify planned actions, coordinate various resource values, and identify harvest levels, cutting cycles, and silvicultural practices for the commercial forest or woodland resource.

Timber and fuelwood sales, timber stand improvement (e.g., thinning), reforestation, slash disposal, and road construction are examples of specific actions proposed in activity plans. Manuals and policy will offer other specific guidance for implementation of these actions. Environmental analyses and forest plans will further identify project implementation and mitigation measures.

Commercial forest and woodland products will be offered for sale. Competitive bidding will be the preferred method for selling commercial timber. Fuelwood, posts, poles, and boughs will be sold to the general public.

Periodic forest inventories will be conducted in an effort to monitor the forest and woodland resources. Inventory data will be incorporated into activity plans and will assist in defining the sustainable harvest level.

Monitoring of these projects will ensure proper implementation. The basic process of monitoring for forestry practices involves on-site inspection of the project. Generally, a pre-work conference is conducted to familiarize the contractor or purchaser with the project area, contract requirements, and other project specifics. During the project life, periodic inspections of the work performance and progress are conducted by the forester. At the end of the project, a final inspection is generally conducted to check for work quality and proper completion of all contract requirements. An assessment of the project is made at that point and recommendations for amending future like projects are made to ensure future successes and streamlining.

¹ A new sustainable harvest level will be calculated as part of this planning effort and in conjunction with a forest inventory which is underway. The actual volume offered may be less than the full biological potential depending upon the number of acres allocated to other uses and the operational constraints built into this land use plan in order to meet multiple use objectives.

Implementation Priorities

High - Revise and update existing timber management plan to reflect management direction of the resource management plan.

Medium - Prepare woodland management plan for large tracts of manageable woodland. Factors considered when determining the priority of management areas include:

- Accessibility to product and market;
- Demand for woodland products;
- Opportunities to complement other resources,

Low - Designate selected areas for post, poles and fuelwood permit areas in lieu of preparation of woodland management plan.

Grazing Management

Continue present management on 124,124 acres (143 allotments) to benefit livestock and wildlife by maintaining and improving ecological condition. The allotments within which this action and other grazing management actions would take place are listed in Appendix F (M and C category allotments) of Draft RMP/EIS.

Maintain existing structural and nonstructural range improvements throughout the planning area. These range improvements consist of 37 water impoundments, 31 springs, 13 seedings, 68 fences, 1 corral, 4 cattleguards, and 2 trails.

Implement structural range improvements (fences, pipelines, water developments and springs) in I category allotments to benefit range and riparian habitat conditions by improving early and middle ecological conditions, and by maintaining and improving late ecological condition on 56,042 acres (14 allotments). Implement grazing treatments on 56,042 acres (14 allotments) and maintain existing grazing treatments on 28,990 acres (3 allotments) to maintain and improve range and riparian habitat conditions.

Implement vegetation manipulation on 4,390 acres within 9 allotments with the goal of increasing future livestock forage primarily to resolve other resource problems on the allotments by shifting grazing use from problem areas.

Authorize all grazing use at present levels to maintain and improve present range condition. Monitoring studies will show changes in condition that will determine whether stocking levels should be adjusted or refine grazing management. The level of use for the proposed plan is 25,323 AUMs (see Appendix F, Table F-I in Draft RMP/EIS for AUMs by allotment).

Implement grazing treatments (see Appendix C, Tables C1 and C2 Draft RMP/EIS) on 56,042 acres within 14 allotments and maintain existing grazing treatments on 28,990 acres within 3 allotments to maintain and improve range and riparian habitat conditions. Adjust season of use on 48,962 acres within 11 allotments to provide for growth requirements of perennial plants, and manipulate grazing use on riparian zones and protect fragile soils.

Manage 28.5 miles of riparian zone to enhance natural values through Bureau/Lessee coordinated grazing treatments and range improvements.

Develop or revise 14 management plans (AMPs or CRMPs).

support

Fire management support will be required for project layout, design, and implementation for vegetative manipulation through prescribed fire. There would be a support need for survey and design features for range improvement and vegetative manipulation and benefit/cost analyses for those range improvements (see Appendix B). Water rights will have to be secured for water developments. Coordination would occur with lessees and affected parties on livestock manipulation and development or refinement of management plans.

Implementation and Monitoring

Implementing and monitoring the livestock grazing portion of this plan would require several separate actions that overlap in time, some of which are underway. These actions include: allotment categorization; AMPs/CRMPs development (range improvement implementation); monitoring to determine stocking levels and forage use decisions; and monitoring to determine if selective management (allotment categorization, see Appendices D and E Draft RMP/EIS) criteria are being fulfilled.

implementation Priorities.

High - Implement AMPs/CRMPs based upon selective management. Priorities for AMP/CRMP implementation are as follows:

- Complete or revise partially completed AMPs/CRMPs;
- Improve category allotments;
- Maintain category allotments;
- Custodial category allotments.

Medium - Monitor allotments to establish stocking rates where data indicates reduction in forage use or where data is inconclusive or nonexistent.

Low - Issue grazing decision where no reductions are required or reductions are negotiated with lessee.

Wildlife and Fish Management

Under the proposed plan, wildlife habitat would be managed to support a proposed bighorn sheep population of 150. Presently an estimated 60 bighorn sheep inhabit the Aldrich Mountain area. The proposed plan would supply approximately 500 AUMs of big game forage, primarily for mule deer, within I category allotments only. Implementation of grazing treatments and range improvements to resolve wildlife concerns.

Maintain existing wildlife water developments. Revise or develop habitat management plans. Development of planned wildlife seedings on 220 acres and juniper/brush control on 1,320 acres. Maintain and improve the current level of habitat diversity. Utilize existing road systems and limit new permanent road entries by emphasizing the use of special timber harvest techniques. Restrict human activity adjacent to active raptor nesting and roosting areas during specific periods of the year.

Manage 28.5 miles of riparian zone to enhance natural values through Bureau/Lessee coordinated grazing treatments and range improvements. During timber harvesting retain buffer strips on streams supporting or having the potential to support fish. Expand steelhead territory by providing passage through man-made and natural barriers. Improve pool to riffle ratio on approximately 50 miles of resident and/or anadromous fish streams by

constructing weirs and deflectors, and placing boulders in streams. Construct and develop fresh water impoundments to provide cold and warm water fisheries while providing for other downstream users. Acquisition of lands, through exchange, to increase and/or expand wildlife habitat.

support

Fire management support will be required for project layout, design, and implementation for vegetative manipulation through prescribed fire. The support need for survey and design features for wildlife improvements and vegetative 'manipulation. Water rights will have to be secured for water developments. Oregon Department of Fish and Wildlife engineering skills will have to be secured for survey and design features for the Izee Falls fish ladder. Within district need for explosives expert to dislodge man-made and natural barriers within affected streams. Coordination with lessees and affected parties on livestock manipulation, and development or refinement of management plans. Develop monitoring studies.

Implementation and Monitoring

Habitat management plans (HMPs) will be written for selected areas of wildlife habitat, e.g., bighorn sheep, bald eagles, resident and anadromous fish. The plans will include detailed information on species emphasis, management objectives, constraints, planned actions, coordination with other programs and agencies, environmental analyses, implementation schedule and cost analyses and evaluation procedures. Priorities will be determined by need (shortage of habitat, conflict with other uses, potential or opportunity for improvement, etc.).

Crucial habitats will be monitored for forage production, habitat condition changes, and overall effectiveness of improvements. Implementation of cooperative agreements with ODF&W for wildlife introductions on public lands. Monitoring studies will include browse, photo trend, eagle inventory, and remote sensing. Wildlife habitat monitoring will enable the Bureau to make decisions on forage allocation and seasonal use restrictions may be made after monitoring described in grazing management.

Streams will be monitored to ensure maintenance of water quality and riparian conditions and to evaluate the effectiveness of stream improvement practices. This monitoring includes riparian inventory and photo trend, water quality inventory, biotic condition-index, fish census and remote sensing of riparian habitat. The priority in which these streams will be monitored and funded for

improvement is based upon characteristics of the fisheries and the intensity of management (see Draft RMP/EIS, page 27).

Implementation Priorities

High - Monitor, maintain or improve habitat for threatened or endangered species, e.g., bald eagles.

Monitor, maintain or improve aquatic habitat on those streams having good potential for fish management. Priorities will be based upon criteria set forth in Draft RMP/EIS. Monitor, maintain or improve riparian habitat as identified in the Draft RMP/EIS. Monitor, maintain or improve bighorn sheep range.

Medium - Monitor, maintain or improve winter range for mule deer and elk. Place priorities for specific treatment in those areas having the greatest problems, the best potential or both. Monitor, maintain or improve aquatic habitat streams having nonintensive management values.

Low - Monitor and maintain aquatic habitat on streams having little or no fish management value. Monitor, maintain or improve habitat for game and nongame species of high interest in the area.

Wild Horse Management

Maintain present wild horse numbers but reduce the herd management area (see Draft RMP/EIS, Chapter 2, pgs 17 & 18) to a proposed 17,270 acres; 10,120 acres BLM administered lands, 6,160 acres of ODF&W lands and 990 acres of private lands. The proposed herd management area will be adjusted to an existing fenced boundary. Revise herd management plan.

Coordinate with U.S. Forest Service to continue monitoring wild horse populations and habitat conditions. Wild horse use adjustments will be made by the Bear Valley Ranger District, U.S. Forest Service, when herd numbers reach the target level. Wild horse disposal processing (adoption program) will be managed by the Bureau through the Burns District.

support

Coordination with affected parties to revise the Murderer's Creek Herd Management Plan. Continuation of wild horse monitoring studies, Coordination and consultation with herd management plan members in removal of wild

horses outside proposed herd management area. Expedite disposal of wild horses through adoption program.

implementation and Monitoring

Monitor wild horse forage and water requirements within proposed herd management area. Coordinate removal of wild horses with U.S. Forest Service when target levels have been reached. Coordinate adoption capabilities with Forest Service for Murderer's Creek HMA excess animals.

Implementation Priorities .

High - Removal of wild horses outside proposed herd management area. Coordinate monitoring of wild horse populations.

Medium - Monitor, maintain or improve forage and water requirements within proposed herd management area.

Low - Revise Murderer's Creek Herd Management Plan.

Land Ownership Adjustment

The proposed plan designates the following land transfer actions in priority order:

1. BLM/Other Federal Jurisdictional Transfers;
2. Transfers to State and Local Agencies (R&PP and other actions);
3. State Exchanges
4. Private Exchange:
5. Sales; (see Appendix A)
6. Desert Land Entries.

This proposed plan would offer 5,240 acres (see Appendix A) for sale and an additional 16,000 acres would be considered (further study) for sale depending upon resource considerations. Therefore, 160,880 acres of public land do not lend themselves to sale designation. Although some disposal and further study lands (21,240 acres) have been predisposed for sale, an exchange action could occur on these lands prior to such action.

support

Support will be needed for conducting land appraisal reports to estimate the value of public land identified for disposal. Support will also be needed to conduct mineral, cultural, and threatened and endangered species resource evaluations. These evaluations will contribute to the environmental analyses on land disposals. Cadastral surveys to delineate specific tracts may be needed in some cases.

Implementation and Monitoring

Land ownership adjustment criteria would be adopted upon approval of this plan (see Draft RMP/EIS, Appendix K). In any given year, between 0 to 20 percent of the 5,240 acres could be offered for sale. However, should any or all of the 16,000 acres of further study lands be incorporated in the sale program the amount of acres could increase. Site specific environmental analyses will be written for proposed disposal. A 45-day public comment period will be provided prior to the disposal action.

Implementation Priorities

High - BLM/other federal jurisdictional transfers and withdrawals and transfer to other Federal, State and local agencies (R&PP and other actions) and exchanges.

Medium - Sales.

Low - Desert Land Entries.

Monitoring the John Day Resource Management Plan

The implementation of the John Day RMP will be monitored during the life of the plan to ensure that management actions are meeting their intended purposes. Specific management actions arising from proposed activity plan decisions will be compared with the RMP objectives to ensure consistency with the intent of the plan. Formal plan evaluations will take place at intervals not to exceed 5 years. These evaluations will assess the progress of plan implementation and determine if:

(1) management actions are resulting in satisfactory progress toward achieving objectives,

(2) actions are consistent with current policy,

(3) original assumptions were correctly applied and impacts correctly predicted,

(4) mitigation measures are satisfactory,

(5) it is still consistent with the plans and policies of State or local government, other Federal agencies, and Indian tribes,

(6) new data are available that would require alteration of the plan.

As part of the plan evaluation the government entities mentioned above will be requested to review the plan and advise the District Manager of its continued consistency with their officially approved resource management related plans, programs and policies. Advisory groups will also be consulted during the evaluation in order to secure their input.

Upon completion of a periodic evaluation or in the event that modifying the plan become necessary, the Burns District Manager will determine what, if any, changes are necessary to ensure that the management actions of the plan are consistent with its objectives. If the District Manager finds that a plan amendment is necessary, an environmental analysis of the proposed change will be conducted and a recommendation on the amendment will be made to the State Director. If the amendment is approved, it may be implemented 30 days after public notice.

Potential minor changes, refinements or clarifications in the plan may take the form of maintenance actions. Maintenance actions respond to minor data changes and incorporation of activity plans. Such maintenance is limited to further refining or documenting a previously approved decision incorporated in the plan. Plan maintenance will not result in expansion in the scope of resource uses or restrictions or change the terms, conditions, and decisions of the approved RMP. Maintenance actions are not considered a plan amendment and do not require the formal public involvement and interagency coordination process undertaken for plan amendments. A plan amendment may be initiated because of the need to consider monitoring findings, new data, new or revised policy, a change in circumstances, or a proposed action that may result in a change in the scope of resource uses or a change in the terms, conditions and decisions of the approved plan.

Ongoing Management Programs

The John Day RMP focuses on three significant resource management issues. Other ongoing BLM management programs and actions discussed in the proposed plan would continue. This section briefly describes these programs and management actions to eliminate confusion regarding their status relevant to the RMP (see Draft RMP/EIS, Chapter 2, Management Guidance Common to All Alternatives, pgs. 23-28).

Soil, Water and Air Management

The inventory and evaluation on project level planning of soil, water and air resources on public lands will continue. Soils will be managed to maintain productivity and to minimize erosion. Corrective actions will take place, where practicable, to resolve erosive conditions. Water sources necessary to meet BLM program objectives will be developed and filed on according to applicable State and Federal laws and regulations. Water quality of perennial streams will continue to be monitored, and climatological data will continue to be gathered.

Mining Administration

Areas not specifically withdrawn from mineral entry will continue to be managed through the 43 CFR 3809 regulations and the mining laws to help meet demand for minerals while preventing unnecessary or undue degradation of other resource values. Activities in areas under wilderness review will continue to be managed under the 43 CFR 3802 regulations to protect their wilderness character until the issue is resolved.

Fire Management

The Burns District will continue fire suppression activities in Grant County. A district-wide fire management plan will be developed that will enhance resource management when used at the activity planning stage. Levels of suppression or limited suppression (or protection) will be identified that will take into consideration public concern and safety, private and/or public impacts, existing management systems, and intermingled land ownership at the activity planning level. Prescribed fire planning will be coordinated with Oregon Department of Forestry and adjacent landowners.

Cultural Resource Management

Cultural resource clearances will be completed on all projects requiring BLM approval or initiated by the BLM that include surface disturbance. Areas or sites eligible for nomination to the National Register of Historic Places will be considered for nomination. Inventories will be conducted to determine the amount and extent of the cultural resource in the planning area.

Botanical Resources

Presently there are no federally listed threatened and endangered (T&E) plants in the RMP area. However, 12 plant species are under review for possible listing as T&E (see Draft RMP/EIS, Chapter 3, p. 40, Table 3-3). Inventories will be conducted to define populations and habitat. To identify any potential impacts on those plants, the Bureau will continue to conduct surveys prior to any significant surface disturbing activity (see Draft RMP/EIS, Appendix B, Standard Operating Procedures No. 4).

Forest Management

Harvest of forest and woodland products for noncommercial use by the public will be permitted consistent with the availability of forest and woodland products and the protection of other resource values.

Livestock Administration

Livestock grazing administrative functions not discussed in the proposed plan will continue. These include issuing grazing licenses, processing allotment transfers, establishing and interpreting range monitoring studies, conducting field examinations, supervising allotments, processing trespass actions, making public contacts, and completing benefit-cost analysis studies for range projects.

Wild Horse Management

Murderer's Creek Herd will be inventoried regularly and horse use adjustments will be made by the Bear Valley Ranger District, U.S. Forest Service.

Wildlife and Fish Management

Quality wildlife and fish habitat will continue to be maintained and improved through existing and planned habitat management plans (HMPs).

Riparian and wetland habitat, and habitat for threatened and endangered species will continue to be identified and protected. Wildlife habitat studies and monitoring will continue as funding allows.

Cadastral Survey and Engineering Programs

Cadastral surveys and engineering activities will continue to be conducted in support of resource management programs. The road maintenance program will continue. Existing approved contracts will not be affected by the RMP.

Realty

All existing corridors will be designated without further review. Corridor widths vary, but are a minimum of 2,000 feet. Applicants will be encouraged to locate new facilities within existing corridors to the extent possible.

Proposed corridors and applications for rights-of-way and for use of the public lands through land use permits, leases, and cooperative agreements will continue to be considered individually. Recommendations made and actions approved will be consistent with the objectives of the RMP.

The withdrawal review program will continue to review existing withdrawals from the land laws to ensure that such withdrawals are still needed and consistent with present management.

Recreation Management

Recreational and visual resources would be evaluated as a part of activity and project planning. Dispersed recreational activities will continue commensurate with demand. Developed recreation sites where low public use levels and/or deteriorated facility conditions do not justify the expenditure of additional maintenance funds will be closed or maintenance transferred to other entities.

Wilderness

Areas under wilderness review will continue to be managed following the guidance of the Bureau's Interim Management Policy for Lands Under Wilderness Review. This policy will be in effect until areas are released from interim management. Areas designated wilderness will be managed under the guidelines of BLM's Wilderness Management Policy.

Chapter 3

Text Revisions



Text Revisions

Significant revisions and corrections to the Draft John Day Resource Management Plan and Environmental Impact Statement (RMP/EIS) are presented in this chapter. A replacement Map 6 "Vegetation Types" was sent to the entire RMP mailing list in June 1984. Typographical errors have been corrected only where they were confusing. The page numbers that appear in bold print throughout this chapter indicate the page of the Draft RMP/EIS on which the addition or correction would appear if the entire draft were being reprinted.

Summary

Page VII, Table 1, Long-Term Livestock Forage, Alternative D. Change AUMs, 23,323 to 25,323.

Page 9, first column, last paragraph. Delete paragraph and insert revision. The BLM's Aldrich Mountain Wilderness Study Area (2-103, see Map 2), containing 9,395 acres, lies on the west side of Aldrich Mountain south of Dayville, Oregon. The BLM's Malheur River-Bluebucket Creek WSA (2-14, see Map 2), containing 5,560 acres, lies adjacent to Malheur National Forest where the Middle Fork of the Malheur River leaves the national forest and contains the lower drainage of Bluebucket Creek. The wilderness suitability of BLM's Aldrich Mountain and Malheur River-Bluebucket Creek WSAs will be addressed in the draft of BLM's Statewide Wilderness EIS scheduled to be released in April 1985. Wilderness Study Areas will continue to be managed in compliance with the Interim Management Policy for such areas until they are reviewed and acted upon by Congress.

Page 10, top of second column. Insert paragraph as shown.

The Oregon Department of Transportation, Parks and Recreation Division has in the past coordinated with the Bureau in making recommendations and proposals for future trail sites. There is presently a trail proposal, "Pacific Crest to Desert" (Ochoco-Malheur) that would cross public and other lands in the southern half of Grant County. BLM supports the concept of this trail. This proposal would receive consideration during activity planning for recreational uses. Designation of this trail by the State would be considered consistent within the goals and objectives of the proposed RMP

Page 12, bottom of Table 1-3. Insert additional Table 1-4 as shown.

Table 1-4 Consistency of the John Day Alternatives with Basic Objectives of the Forestry Program for Oregon¹

Basic Objective

To maintain the maximum commercial forest land base consistent with resource uses while assuring environmental quality.

To maintain or increase the allowable annual harvest level to its fullest potential to offset potential socio-economic impacts.

To identify and implement the levels of intensive forest management required to achieve maximum growth and harvest.

To maintain community stability by remaining flexible for increases in future harvest levels that would offset projected shortages.

Discussion

Alternatives A, B and D are consistent with the benchmark (approximately 32,500 acres) of commercial forest land base minus the non-operable lands. Alternative C is inconsistent. Environmental quality would be protected to the degree specified in the Oregon Forest Practices Act.

Alternatives A, B and D are consistent with the benchmark of a 2.2 MMbf annual sustainable harvest level while Alternative C is inconsistent. The level of cutting the land base can sustain is dependent on number of acres allocated to timber production, level of management the land base receives and productivity of the land.

A full range of intensive timber management practices for optimizing timber production would be implemented under all alternatives. New and improved practices would be implemented consistent with technological advances.

Annual BLM timber sales ranging between 1.32 and 2.21 MMbf would not affect community stability within the RMP Area.

¹Based upon the Oregon State Department of Forestry, Forestry Program for Oregon. published 1977 and updated 1982

Page 33, Table 2-6 - Management Direction by Alternative, Lands Program Direction (Revised to expand priority list).

Lands Program Direction and Land Tenure Adjustment by Priority ¹

Alternative A	Alternative B	Alternative C	Alternative D
1) BLM/Other Federal Jurisdictional Transfers	Same as A.	Same as A.	Same as A.
2) Transfers to State and Local Agencies (R&PP and other actions)	Same as A.	Same as A.	Same as A.
3) State Exchanges	Same as A.	Same as A.	Same as A.
4) Private Exchanges	Same as A.	Same as A.	Same as A.
5) Sale of public land with the following exceptions:	Same as A without the following exceptions: (See Appendix A.)	No sale of public land.	Existing public land sale program
-Forestlands -Riparian zones on streams supporting or having the potential to support anadromous fisheries -Recreation sites -Bighorn sheep habitat -Selective management categories M, I and CI -Retention of S, T & E plant and animal habitat -Significant big game habitat	-Forestlands -Significant big game habitat.		
5,240 acres ^{2/3}	21,014 acres ^{2/3}	-0- acres	36,779 acres ³
6) Desert Land Entries	Same as A.	Same as A.	Same as A.

¹ John Day Planning Unit only.

² An additional 16,000 acres (shown on Map 4 in the RMP/EIS) may be available depending on a case by case analysis of significant big game habitat and forest management considerations.

³ Estimated acres available for sale.

Page 64, Table 4-3, Range improvements. Change the footnote on Juniper/Brush Control and Seeding from 1 to 2.

Page 104, Table C-2, Allotment No. 4007. Delete pasture number 06.

Page 68, second paragraph. Insert after the last sentence.

Nongame species which require juniper and shrubs for cover and food would be adversely impacted by the juniper and brush control projects. Those species which require open grassland habitat would be beneficially impacted by these projects. The proposed water developments would provide water to nongame wildlife in areas that have historically been devoid of water.

Page 709, Table E-I, Problems, Opportunities and Objectives for Grazing Management. Revised as follows (to clarify relationships between Situations and Management Actions):

Situation	Management Action
Grazing season and selective grazing habits of different kinds of livestock could reduce the quality and quantity of vegetation produced by a plant community.	<p>Change the season of use and/or the class or kind of livestock.</p> <p>Implement rotational grazing systems that would provide for plant maintenance requirements.</p>
Livestock use could be poorly distributed within an allotment or pasture. This could result in heavy utilization of some sites while others may receive little or no grazing use.	<p>Develop new resources of water to distribute livestock more evenly.</p> <p>Construct drift fences to alter traditional grazing patterns.</p> <p>Specify placement of salt and mineral Supplement.</p> <p>Require herding livestock.</p> <p>Authorize the class or kind of livestock that would best utilize the allotment.</p>
Current levels of livestock use may exceed the carrying capacity of an allotment.	Monitor actual livestock use and resulting levels of utilization to determine the proper carrying capacity.
Some sites that are now producing a quality and quantity of forage well below their potential have a poor potential to respond to changes in grazing management alone.	Restore productivity of these sites through mechanical treatment and/or seeding with well-adopted species.
Investments in range improvements needed to implement changes in grazing management often do not have favorable benefit/cost ratios.	<p>Solicit contributions from range users and other parties benefiting from changed grazing management.</p> <p>Design grazing management systems that require a minimum investment in range improvements, but would meet the stated objectives.</p>
Plant and animal pests can adversely affect livestock and vegetative productivity. -	In cooperation with other affected landowners, take actions to control concentrations of pests.

Page 115, Table H-I, Habitat Condition and Trend, Rainbow Trout (*Salmo gairdneri*), John Day RMP Area ¹.

Stream Name	Stream Miles	Poor	Fair	Condition		Trend	Species
				Good	Excellent		
John Day River	2.80	1.85	.95			S	Rb,ChS,StS,DV SB,CC,BrB,NG
N.Fork John Day	14.07		13.57	.50		S	Rb,ChS,StS,DV SB,CC,BrB,NG
Rudio Creek	3.55	1.50	2.05			S	Rb,StS,NG
Gilmore Creek	.60	.60				D	Rb,StS,NG
Straight Creek	.30	.30				D	Rb,NG
Cottonwood Cr	.65		.65			S	Rb,Sts,SB,CC,NG
Squaw Creek	1.50	1.50				U	Rb,StS,NG
Middle Fork	1.45	.20	1.25			U	Rb,Sts,Chs,NG,DV
John Day River							
Cole Canyon	.60	.60				S	Rb,NG
Long Creek	.30	.30				U	Rb,StS,NG,
Mallory Creek	.25	.25				S	Rb,StS,NG
Graves Creek	.15	.15				S	Rb,StS,NG
Potamus Creek	.25	.25				S	Rb,StS,NG
Sulphur Gulch	.30	.30				S	Rb,NG
Rattlesnake Cr	.35	.35				S	Rb,NG
Cottonwood Creek	1.50		1.50			D	Rb,StS,NG
Battle Creek	2.00	2.00				S	Rb,NG
S. Fork John	14.45	3.85	8.55	2.05		S	Rb,StS,NG
Day River							
Murderer's Cr	.20		.20			S	Rb,StS,NG
Cabin Creek	.45			.45		S	Rb,NG
Frazier Creek	1.00	.25	.50	.25		S	Rb,StS,NG
Martin Creek	.25	.25				S	Rb,NG
Deer Creek	2.90	.25	2.65			U	Rb,StS,NG
Sunflower Creek	.85	.25	.60			S	Rb,NG
Wildcat Creek	.25	.25				S	Rb,NG
Tamarack Creek	.25	.25				S	Rb,NG
Flat Creek	1.10	1.10				D	Rb,NG
Utley Creek	.60	.60				D	Rb,NG
Delles Creek	.50	.50				S	Rb,NG
Canyon Creek	1.45		1.45			S	Rb,CtY,StS,BT,NG
E. Fork Pine Cr	.15		.15			S	Rb,StS,NG
W. Fork Pine Cr	.45		.45			S	Rb,StS,NG
Indian Creek	.45		.45			S	Rb,StS,NG
Dixie Creek	2.10	1.15	.65	.30		U	Rb,StS,NG
Standard Creek	.90	.65	.25			S	Rb,StS,NG
E. Fork Standard	.65	.65	.65			S	Rb,StS,NG
Dad's Creek	.30	.30				S	Rb,StS,NG
Silvies River	.20	.20				S	NG
Jump Creek	.30		.30			S	Rb,NG
Flat Creek	.40	.40				S	Rb,NG
Mountain Creek	.50	.50				S	Rb,NG
TOTALS	61.27	21.55	36.17	3.55	0.00		
%	100%	35	59	6	0		

¹ Changes are identified in bold.

Key to Symbols:

Rb- Rainbow Trout
StS- Summer Steelhead
Chs- Spring Chinook Salmon
CtY- Yellowstone Cutthroat Trout
DV- Dolly Varden

BT- Brook Trout
SB- Smallmouth Bass
CC- Channel Catfish
BrB- Brown Bullhead
NG- Nongame

S = Stable **D** = Downward **U** = Upward

Chapter 4

Consultation and Coordination



Consultation and Coordination

The Draft John Day Resource Management Plan and Environmental Impact Statement (RMP/EIS) was prepared by an interdisciplinary team of specialists in the Three Rivers Resource Area and Burns and Vale District Divisions of Resources. Specialist expertise included soils, range management, wildlife, lands, geology, recreation, economics, wild horses, forestry, and archaeology. The list of preparers appears at the beginning of Chapter 6, Draft RMP/EIS.

Writing of the RMP/EIS began in October, 1983; however, a complex process that began in 1981 preceded the writing phase. This process included resource inventory, public participation, interagency coordination and preparation of a management situation analysis (on file in the Burns District Office). Consultation and coordination with agencies, organizations and individuals occurred in a variety of ways throughout the planning process.

Public Participation

On January 28, 1981, notice was published in the Federal Register and local news media which announced the formal start of the RMP planning process. On February 10, 1981 two public meetings were held in Grant County to aid the Burns District on initial issue identification for the John Day RMP Area. A few days later a meeting was held with the U.S. Forest Service to discuss issues and concerns. A letter was sent to affected range users and government agencies in March 1981 to announce a vegetative and soils inventory would be conducted that field season and the resulting data would be used in the RMP.

Shortly thereafter, in April 1981, Planning Report Number 1 was sent to the public to request further definition of major issues within the planning area. Planning Report Number 2, published in June 1981, requested comments from the public on 14 preliminary issues derived by the earlier process,

In December 1982 Planning Report Number 3, a Federal Register Notice, and local news media publications suggested than an amendment to the existing plan might be more appropriate than a total plan revision. It also provided an opportunity to comment on proposed criteria for the formulation of alternatives. Public comments and staff analysis confirmed the need for continuation of the RMP process.

On October 18, 1983 a notice of document availability was published in the Federal Register and subsequently in the local news media for the John Day Resource Management Plan Proposed Land Use Alternatives brochure. This document provided an outline of proposed alternatives, listed major issues and revised planning criteria. Three alternatives portrayed various resource programs showing an arrangement from emphasis on production of commodities to emphasis on enhancement of natural values with a midground alternative attempting to establish a point between the two. The fourth alternative portrays the existing situation. Four major issues were displayed and 11 planning criteria were cited for development or selection of the Preferred Alternative.

Other informal coordination with the public and government agencies took place throughout the planning process by means of personal contacts, phone calls, etc.

On June 20, 1984 a Federal Register notice announced availability of the Draft John Day Resource Management Plan and Environmental Impact Statement and provided addresses for obtaining copies and for submitting written comments. It stated that the public comment period would begin June 14 and end on September 13, 1984. Two public meetings were scheduled for July 25 and 26, 1984 for the purpose of receiving oral and written comments. Two different news releases, radio and newspaper, one on June 28, 1984 and the other on the day of the meeting, listed the planning issues, and confirmed the closing date of the 90-day comment period for public comments to be considered in the proposed RMP and final EIS.

An additional meeting was arranged with the Monument Soil and Water Conservation District on August 7, 1984 at 7:30 p.m. At the three meetings the document was discussed and it was noted how the issues were resolved by respective alternative. Members of the interdisciplinary team were available to answer questions and discuss concerns. The public in attendance was encouraged to submit written comments. Oral comments at the meetings primarily centered around two issues; range improvement implementation and land tenure adjustment. The latter issue was discussed at length during the Monument Soil and Water Conservation District meeting.

The oral comments favored public land transfers or exchanges or sale to adjacent landowners over general land sales. The land tenure adjustment policy in the proposed plan favors transfers and exchanges over sales.

Consistency Review

Prior to approval of the proposed RMP, the State Director will submit the plan to the Governor of Oregon and identify any known inconsistencies with State or local plans, policies or programs. The Governor will have 60 days in which to identify inconsistencies and provide recommendations in writing to the State Director. The consistency of the plan with the resource related plans, programs and policies of other Federal agencies, State and local government and Indian tribes will be re-evaluated in the future as part of the formal monitoring and periodic evaluations of the plan.

Comment and Protest Procedures

If you wish to make comments for the District Manager's consideration in the development of the decision, please submit your comments by **December 31, 1984** to the District Manager, Burns District Office. The plan decisions will be based on the analysis contained in the EIS, and additional data available, public opinion, management feasibility, policy and legal constraints.

Any person who participated in the planning process and has an interest that is or may be adversely affected by approval of the proposed RMP may file a written protest with the Director of the Director of the BLM within 30 days of the date the EPA publishes the notice of receipt of the proposed RMP and final EIS in the Federal Register. Protests should be sent to the Director, Bureau of Land Management, 18th and C Streets NW, Washington D.C. 20240 by **December 31, 1984**. The protest shall contain the name, mailing address, telephone number, and interest of the person filling the protest: a statement of the issues being protested (raising only those issues that were submitted for the record during the planning process); a statement of the parts of the plan being protested; copies of all documents addressing the issues submitted during the planning process by the protesting party, or an indication of the date the issues were discussed for the record; and a concise statement explaining why the State Director's decision is believed to be wrong.

The Director shall render a prompt written decision on the protest, setting forth the reasons for the decision. The decision shall be sent to the protesting party by certified mail and shall be the final decision of the Department of the Interior.

Burns District Advisory Council

The Bureau's Burns District Advisory Council participated in a review of the preliminary draft of the Preferred Alternative and scoping analysis. Their review and subsequent feedback was helpful in formulation of the Preferred Alternative. The Advisory Council also reviewed the Draft RMP/EIS and provided comments on the adequacy of the document.

Agencies and Organizations Consulted During Scoping of the RMP/EIS

Bonneville Power Administration
Forest Service
National Park Service
Soil Conservation Service

Federal Agencies

Advisory Council on Historic Preservation
Department of Agriculture
• Forest Service-
• Soil Conservation Service
Department of Defense
• Army Corps of Engineers
Department of the Interior
• Fish and Wildlife Service
• Geological Survey
• National Park Service
• Bureau of Mines
• Bureau of Reclamation
Environmental Protection Agency

State and Local Governments

Harney County Court
Grant County Planning Commission
Oregon Department of Fish and Wildlife

Interest Groups and Organizations

Dayville Grazing Association
Intermountain Consultants
Mazama Conservation Commission
Minerals Exploration Coalition
Wildlife Management Institute

List of Agencies, Organizations and Persons to Whom Copies of the Statement Were Sent

Advisory Council on Historic Preservation

Department of Agriculture

- Forest Service
- Soil Conservation Service
- Department of Defense
- Army Corps of Engineers
- Department of Energy
- Bonneville Power Administration
- Department of the Interior
- Bureau of Indian Affairs
- Geological Survey
- National Park Service
- Bureau of Mines
- Bureau of Reclamation
- Environmental Protection Agency

State and Local Governments

Grant County Planning Commission
 Harney County Planning Commission
 Oregon Department of Environmental Quality
 Oregon Department of Fish and Wildlife
 Oregon Department of Forestry
 Oregon Department of Geology and Mineral Industries
 Oregon Department of Land Conservation and Development
 Oregon Department of Transportation and Parks and Recreation Division
 Oregon Division of State Lands
 Oregon State Clearinghouse
 Oregon State Historic Preservation Officer

Interest Groups and Organizations

Association of Oregon Archaeologists
 Audubon Society
 Belfair Packrat Search Rescue
 Birch Creek Hunt Club
 Columbia River Inter-Tribal Fish Commission
 Confederated Tribes of the Umatilla Indian Reservation
 Central Oregon Conservationists
 Defenders of Wildlife
 Delta Funds, Inc.
 Desert Rats
 Eastern Oregon Mining Association
 Edward Hines Lumber Company
 Environmental Impact Service
 Environmental Education Center
 1000 Friends of Oregon
 Geothermal Resources Council
 Grant County Conservationists
 Grant County Resource Council
 Hudspeth Sawmill Company

Institute of Ecology
 Izaak Walton League
 League of Women Voters of Oregon
 Mazamas
 Maintain Eastern Oregon Wilderness
 National Association Conservation Districts
 National Wildlife Federation
 Natural Resources Defense Council
 Northwest Federation of Mineralogical Societies
 Northwest Mineral Prospectors Club
 Northwest Mining Association
 Northwest Petroleum Association
 Ochoco Lumber Company
 Oregon Cattlemen's Association
 Oregon Council of Rock and Mineral Club
 Oregon Environmental Council
 Oregon Farm Bureau Federation
 Oregon High Desert Museum
 Oregon Historical Society
 Oregon Natural Heritage Program
 Oregon Parks and Recreation Society
 Oregon Sheepgrowers
 Oregon Natural Resources Council
 Oregon Wildlife Federation
 PNW 4-Wheel Drive Club, Region 5
 Pacific Power & Light Company
 Public Lands Institute
 Puget Sound Power and Light Company
 Sierra Club
 Siuslaw 4-Wheel Drive Club
 Snow Mountain Lumber Company
 The Nature Conservancy
 The South Fork Drainage Basin Council
 Survival Center
 Timber Linn 4-Wheelers
 Western Land Exchange
 Western Oil and Gas Association
 Whatever 4-Wheelers
 Wilderness Society
 Wildlife Management Institute

Approximately 300 other individuals and organizations have received copies. Approximately 165 minerals and energy-related companies, individuals, corporations and related institutions have received copies. Approximately 30 timber-related companies have received copies of the RMP. All lessees within the John Day Planning Area have received copies. Approximately 800 copies of the RMP/EIS have been mailed.

Copies of this draft **RMP/EIS** will be available for public inspection at the following BLM offices and local libraries.

Washington Office of Public Affairs
18th and C Streets
Washington, DC. 20240
Phone (202) 343-5717

Oregon State Public Affairs Office
825 N.E. Multnomah
P.O. Box 2965
Portland, Oregon 97208
Phone (503) 231-6277

Burns District Office
74 South Alvord
Burns, Oregon 97720
Phone (503) 573-5241

Grant County Library
507 S. Canyon Boulevard
John Day, Oregon 97845
Phone (503) 575-1992

Harney County Library
80 West "D" Street
Burns, Oregon 97720
Phone (503) 573-6670

Comment Analysis

The comment letters received concerning the Draft RMP/EIS are reprinted in the following section. Changes or additions to the draft arising from public comments are included in Chapter 3 of this Proposed RMP and Final EIS, Text Revisions. The letters which were received have been reproduced in this proposed RMP and final EIS, with each substantive comment identified and numbered. BLM responses immediately follow each of the letters.

Number Agency, Organization or Individual

- 1 USDI, Bureau of Reclamation
- 2 Minerals Exploration Coalition
- 3 Oregon Department of Forestry
- 4 Oregon Department of Transportation, Parks and Recreation Division
- 5 Oregon Department of Fish and Wildlife
- 6 Department of Energy, Bonneville Power Administration
- 7 Wildlife Management Institute
- 8 Mrs. Ethel W. Thorniley
- 9 Department of Commerce, National Oceanic and Atmospheric Administration
- 10 The Wilderness Society
- 11 USDA, Soil Conservation Service
- 12 Clive Lister
- 13 George M. Stubblefield
- 14 Ellen Mendoza and Charles Landman
- 15 Audubon Society of Portland
- 16 Atlantic Richfield Company
- 17 USDI, Fish and Wildlife Service
- 18 USDA, Malheur National Forest
- 19 John R. Swanson
- 20 Oregon Hunter's Association
- 21 U.S. Environmental Protection Agency



United States Department of the Interior

BUREAU OF RECLAMATION
PACIFIC NORTHWEST REGION
FEDERAL BUILDING, U.S. COURTHOUSE
BOX 900-200 WEST 100TH STREET
BOISE, IDAHO 83724

PN 150
125.

JUL 12 1984

Memorandum

To: Project Leader, Bureau of Land Management, Burns, Oregon
Attention: Larry Morgan

From: Regional Environmental Officer, Bureau of Reclamation,
Boise, Idaho

Subject: John Day Resource Management Plan - Environmental Impact Statement

The subject document has been reviewed by appropriate members of our staff, and we have no objections to its content. Please let us know if we can be of further assistance in the review process.

John R. Woodworth

cc: Commissioner, Washington, D.C., Attention: 150

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Euseo Gonzalez-Urena
Lakewood Colorado

W. Glen Zinn
Englewood Colorado

EXPLORATION COALITION

Minerals Advocates
In Public Policy

12840 West Cedar Drive
P.O. Box 1963
Denver Colorado 80215
(303) 494-5121

JUL 23 1984

Mr. Larry Morgan, Project Leader
Bureau of Land Management
Burns District Office
74 South Alvord
Burns, Oregon 97720

Dear Sir:

These comments constitute the response of the Minerals Exploration Coalition (MEC) to the Draft Environmental Impact Statement on the John Day Resource Management Plan. The MEC is a coalition of exploration companies and individuals conducting exploration on federal lands.

MEC believes that all areas with mineral and energy potential should be open for exploration, development and production. Current land use planning regulations and management tools provide methods and procedures for the resolution of conflicts between competing uses without highly restrictive, rigid land classifications.

Inasmuch as the RMP Area will continue to meet the existing demand for minerals and energy resources and minimal or no constraints on mineral exploration and development now exist and the need for such constraints has not been identified, MEC has no preference of alternative.

MEC thanks you for the opportunity to comment on this plan.

Sincerely,

John D. Wells

John D. Wells
President
Minerals Exploration Coalition

*Executive Committee member

3



Executive Department

155 COTTAGE STREET NE SALEM, OREGON 97310

July 31, 1984

Joshua L. Warburton, District Manager
Bureau of Land Management
Burns District Office
74 South Alvord
Burns, OR 97720

Thank you for submitting the subject Environmental Assessment for State of Oregon review and comment.

The Department of Forestry has submitted the attached comments for your consideration.

Sincerely,

INTERGOVERNMENTAL RELATIONS DIVISION

Dolores Streeter
Dolores Streeter
Clearinghouse Coordinator

DS:tlw

enclosure



Forestry Department

OFFICE OF STATE FORESTER

2600 STATE STREET, SALEM, OREGON 97310 PHONE 378-2560

July 27, 1984

Mr. Joshua L. Warburton, District Manager
Bureau of Land Management
Burns District Office
74 South Alvord
Burns, Oregon 97720

SUBJECT: JOHN DAY RESOURCE MANAGEMENT PLAN

Dear Mr. Warburton:

The Oregon State Forestry Department has reviewed the John Day Resource Management Plan Environmental Impact Statement. The Department is interested in the proposed plan since it addresses management of over 34,000 acres of commercial forest lands suitable for sustained yield production.

3-1 The section of the plan dealing with interagency coordination between BLM and state agencies need to address consistency of the forest management program with the Forestry Program for Oregon and Oregon's Statewide Land Use Goals and Objectives.

We strongly support the need to address three concerns identified in the draft plan as major issues: (1) Forest Management; (2) Forage Use; and (3) Land Ownership Adjustment. In addressing these issues we suggest that conservation of the commercial forest land base is of utmost importance in order to maintain a continuous, high level of fiber and forage production.

We urge you to consider alternatives for forest management that are consistent with the Forestry Program for Oregon objectives to maintain the commercial forest land base and management objectives and timber harvest levels designed to promote community stability.

We hope these concerns will be addressed in the John Day Resource Management Plan.

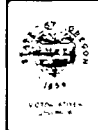
Sincerely,

H. Mike Miller

H. Mike Miller
State Forester

HMM/RM:jd
cc: Board of Forestry
Executive Staff
Fred Graf
Earl Brown

A consistency determination with the Forestry Program for Oregon is included in Chapter 3 Text Revisions as Table 1-4. Consistency of the John Day Alternatives with Basic Objectives of the Forestry Program for Oregon.



Department of Transportation
PARKS AND RECREATION DIVISION
525 TRADE STREET SE. SALEM, OREGON 97310

August 10, 1984

RECREATION TRAILS
ADVISORY COUNCIL

CHAIRMAN
Ernest Draballa
250 Poplar, 4th Floor
Eugene, OR 97401

VICE-CHAIRMAN
Louise Mellick
325 Foster Lane
Roseburg, OR 97470

J. Earl Fiske
13840 SE Hwy 212, Sp 72
Clackamas, OR 97015

John M. Jennings
2441 NE 50th
Portland, OR 97213

Wallace Johnson
2871 NW Monterey Park
Corvallis, OR 97330

Russell J. Pengelly
Box 611
Burns, OR 97720

James R. Ramsey
4046 NW Hwy 26
Madras, OR 97541

Bob Westenberg
374 S. Denver
Astoria, OR 97103

COORDINATOR
Jack Remington
Recreation Trails System
525 Trade St. SE
Salem, OR 97310

Larry Morgan, RMP/EIS Team Leader
Bureau of Land Management
Burns District
74 S. Alvord
Burns, OR 97720

Dear Larry:

RE: Draft EIS, John Day Resource Management Plan

Since the early 1970s there has been an interest in developing an east-west trail as part of the proposed State Recreation Trails System which would tie together the Pacific Crest National Scenic Trail and the Desert Trail. The trail would be composed of existing trails, old roads, and some new construction in three National Forests (Deschutes, Ochoco and Malheur), Crooked River National Grassland and some BLM public lands. In some places where there is no public land, the trail will have to be on the shoulder of existing public roads.

In 1976, Lee Simons of the Ochoco National Forest identified a possible location within that forest, and the same year a student intern in the State Trails Program identified a possible location for the entire trail. That location is shown as a broad corridor on the enclosed diagram taken from the State Trails Plan. The tentative name for the trail is the "Pacific Crest to Desert Trail, (Ochoco-Malheur)."

The proposed corridor for this trail (in more detail) is as follows:

Going eastward, the trail leaves Ochoco National Forest by descending Black Canyon Creek to its junction with the South Fork of the John Day River. It follows the South Fork to Murderer's Creek, crosses the bridge, then ascends the ridge north of Chickenhouse Gulch. The trail will pass through Wilderness Study Area OR-2-103, travel along a primitive road into the Malheur National Forest and to Cabbage Patch Spring, then eastward through the Aldrich Mountains. It appears that in passing between the Ochoco and Malheur National Forests the trail can be on lands available to the public all the way.

Larry Morgan
RE: Draft EIS, John Day Resource Management Plan
August 10, 1984
Page 2

4-1 This letter is a request for inclusion of this proposed State Recreation Trail in the John Day Resource Management Plan.

Sincerely,

Jack Remington
Jack Remington, Coordinator
Recreation Trails System

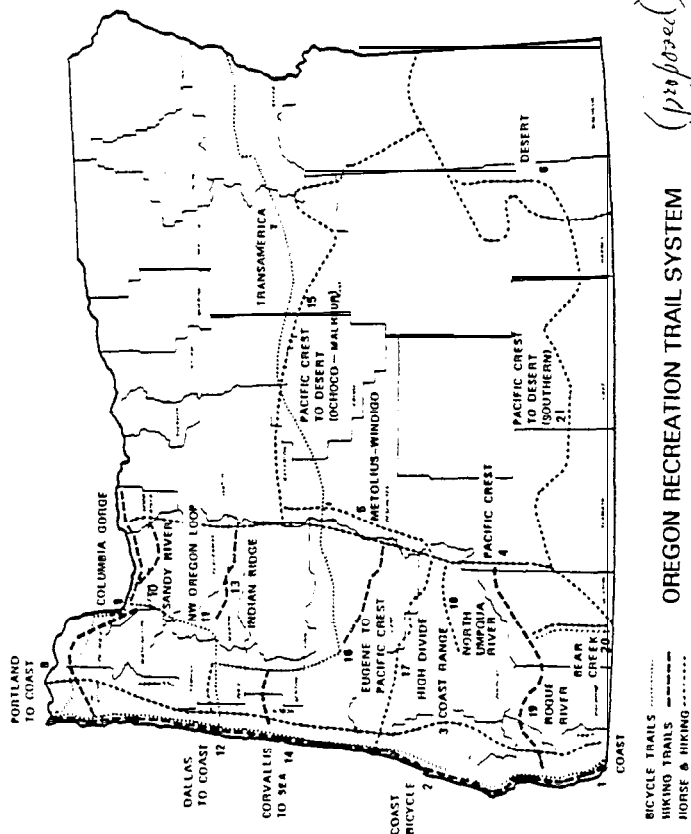
J:aln
3386C

Enclosures

cc: Russ Pengelly
Dave Talbot

4-1

Refer to Chapter 3 Text Revisions for page 10 of the Draft RMP/EIS concerning the trail proposal.





Department of Fish and Wildlife
5065 W. MILL STREET, P.O. BOX 3503, PORTLAND, OREGON 97208

Mr. Joshua L. Warburton
August 10, 1984
Page 2

August 10, 1984

Mr. Joshua L. Warburton
District Manager
Bureau of Land Management
74 South Alford Street
Burns, Oregon 97220

RE: John Day Resource Management Plan

Dear Mr. Warburton:

The Department of Fish and Wildlife has reviewed the John Day RMP Draft EIS. The plan reflects a comprehensive treatment of the resource and the issues involved by your staff. Our comments and recommendations are detailed below.

Fish Habitat

- 5-1 If the laddering of South Fork Falls is accomplished, there are many miles of stream in the upper South Fork John Day drainage in degraded condition. Some specific consideration for removal of grazing and restoration of riparian zones in these areas should be included in the plan.

Wildlife Habitat

Changes in grazing systems or range improvements on critical mule deer winter range should be done carefully, considering the potential for decreasing carrying capacity through forage removal and composition change.

Land Management Activities

Logging and associated roading can have adverse impacts on water quality, fish habitat and big game habitat. The technology necessary to protect these resources is available, and should be utilized from the planning stage through project completion. Operators should be acquainted with potential impacts and monitoring efforts should be designed to insure techniques used to minimize impacts to the resource are administered properly. The plan should include assurance of proper administration of operations to insure habitat protection.

Soil and watershed management would best be accomplished under Alternative C with livestock grazing restricted or excluded from riparian zones. ODFW strongly recommends this level of management.

Stream buffers of a minimum width of 100 feet are recommended to insure enhancement of riparian zones.

Land Exchanges

- 5-3 The plan should address BLM land exchanges that provide benefits to fish, wildlife, recreation and other resources. Exchanges should favor critical wildlife ranges and riparian and stream habitats. Wherever possible exchanges should be made to put these critical habitats in public ownership.


Recommendation: Alternative C

In general, this alternative would create the best situation for fish and wildlife. However, the increase in the wild horse herd in the Murderers Creek area under this option would cause conflict with big game and water quality in the area. We support the enhancement option (Alternative C) throughout the plan with the exception of the wild horse herd population level. We strongly recommend leaving the herd at a level consistent with the Murderers Creek CRMP (100 animals) as recommended in our comments on the John Day RMP Proposed Land Use Alternatives dated November 23, 1983.

We appreciate the opportunity to comment on this Resource Management Plan. If more information or clarification is necessary regarding the above, please contact our local district staff personnel.

Contact: Errol Claire, District Fish Biologist; or Greg Hattan, District Wildlife Biologist; P.O. Box 9, John Day, Oregon, 97845; phone number 575-1167.

Sincerely,


Robert N. Jubber
Forest Policy Coordinator
Environmental Management Section

RNJ:dle
cc: Claire/Hattan
NE Region

- 5-1 Upon completion of the proposed fish ladder around Izee Falls, the South Fork of the John Day River and its tributaries would be available to anadromous fish. Therefore, the intensity of management would increase as shown in the Draft RMP/EIS, page 27, and habitat restoration through various management practices would be possible. The Bureau manages a relatively minor share of stream miles in the upper drainages of the South Fork of the John Day River therefore, to attain maximum aquatic and riparian habitat improvement, many agencies and landowners will have to be actively involved.
- 5-2 All contracts related to timber harvest or silvicultural prescriptions will be administered by a BLM project inspector. During timber harvesting operation (road construction and harvest techniques or silvicultural treatments) execution of the contract would be directed by constraints and set-asides set forth in the RMP and General Best Forest Management Practices (see Draft RMP/EIS, Appendix G).
- 5-3 The Proposed Plan favors acquisition by exchange to benefit wildlife habitat, especially riparian and aquatic habitats. See Chapter 2, Goals and Objectives of the Proposed Plan, Wildlife and Fish Management.



Department of Energy
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208

AUG 24 1984

SEP 11 1984

Mr. Larry Morgan
Burns District Office
Bureau of Land Management
U.S. Dept. of the Interior
74 South Alvord
Burns, Oregon 97720

Dear Mr. Morgan:

We have reviewed the draft environmental impact statement (EIS) on the John Day Resource Management Plan.

The draft EIS addresses the utility corridor concern expressed in the Bonneville Power Administration Engineering Manager's letter of September 22, 1983, to the Deputy State Director for Lands and Renewable Resources. We appreciate the responsive handling of transmission corridors in the draft EIS and wish to thank you for the opportunity to review the document.

Sincerely,

for Nicholas J. Stos
Anthony R. Morrell
Environmental Manager

Enclosure:
September 22, 1983 Letter

Mr. Stanley Butzer
Deputy State Director for Lands
and Renewable Resources
Bureau of Land Management
Oregon State Office
P.O. Box 2965
Portland, Oregon 97208

Dear Mr. Butzer:

This letter is written in response to your request of August 14, 1983, for our evaluation of transmission corridor requirements which could be affected by the Burns District John Day Resource Management Plan.

As a result of discussions with Eric Stone, we have concluded that the John Day Resource Management Plan should not affect or address any potential long range transmission needs. The use of a major east to west corridor through Grant County is currently not being planned, and we agree that if such a need were to arise, that it should be addressed at that time. Wilderness or wilderness study areas (exclusion areas) that currently are being considered in the planning area can be avoided. We, however, suggest that the Columbia Power Coop be contacted to determine whether they have any transmission which could be affected.

We strongly recommend that all existing transmission lines, 69 kV and above, be designated as corridors or windows (minimum of 2000 feet) to protect them from incompatible encroachments.

We would appreciate being kept informed and would like to be included on your project mailing list.

Sincerely,
James F. Clark
FOR
Charles F. Clark
Engineering Manager

cc: John Creek, BLM

7



Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
WILDLIFE MANAGEMENT INSTITUTE
WASHINGTON, D.C.

August 28, 1984

Mr. Larry Morgan, Project Leader
Bureau of Land Management
Burns District Office
74 South Alvord Street
Burns, Oregon 97720

Dear Mr. Morgan:

The Wildlife Management Institute is pleased to comment on JOHN DAY RESOURCE MANAGEMENT PLAN, ENVIRONMENTAL IMPACT STATEMENT, Oregon.

The plan is well written and organized. The environment effects are well stated. Plan details and their effects are very well presented in the tables. This is one of the most complete BLM plans we have seen in the last two years.

The preferred alternative is not satisfactory for wildlife. We prefer the resource enhancement alternative for the following reasons:

1. Enhancement provides very good riparian protection.
2. Enhancement retains substantial amounts of old growth timber vs. no old growth in the preferred alternative.
3. Enhancement recognizes and gives protection to cover and forage areas.
4. Enhancement reduces livestock use in Murderer's Creek study area.

7-1 None of the alternatives make substantial forage allocations to wildlife. This needs explanation.

Mr. Larry Morgan

-2-

August 28, 1984

7-2 There are two important omissions. What is the recent average use by livestock? What are Oregon Department of Fish and Wildlife's (ODFW) goals and how do they relate to the BLM share of attaining those goals?

We like the provision for managing riparian areas by fenced pastures (page 20). This is much more realistic than complete protection.

7-3 A detailed description of the monitoring program should be included. What will it cost? Who will do it? What part will ODFW have in monitoring?

From the text, we are informed that range improvements costs of \$183,000 in the enhancement alternative are for nonlivestock purposes. Therefore subtracting that sum from the \$431,220 range development costs in the preferred alternative leaves \$248,220 as the cost of range improvements made to benefit livestock. There is no short term increase in the AUM's produced, and only 421 more AUM's will be produced in the long term. All the benefits will go on 14 "Improvement Allotments".

The cost of these new AUM's will be \$590 each, and the subsidy per "I" allotment will be \$17,730. It is inconceivable that the taxpayer should bear these costs.

Some specific comments follow:

7-4 p. 20, last par. The preferred alternative is not a "midground approach". It is low on riparian protection, provides no increase in deer and no old growth timber.

7-5 p. 22, 1st par. "...1,280 acres foregone to protect big game habitat." Foregone from what? Deer were there before cows and it is time that deer had some priority use areas. These small wildlife allocation areas are long overdue.

7-6 p. 30, Range Improvements, Alt. C. From this we assume that range improvements that do not enhance natural values are not cost effective. This statement should be highlighted.

p. 30. We commend you for the preparation and inclusion of management direction tables. They are very helpful.

7-7 p. 72, Ranch values and table 4-8. These tabulate the value added to ranch property by a federal AUM permit. This value is not recognized by the government and should be so stated.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,
Daniel A. Poole
Daniel A. Poole
President

DAP:msm

7-1 Wildlife allocations were based on herd use areas and seasons of use as identified by ODFW and Bureau specialists. The proposed plan maintains forage allocations to wildlife only where these AUMs are in competition between big game and livestock. The allocation of competitive AUMs to big game are based upon 42,000 acres of mule deer, elk, and antelope and bighorn sheep winter range within improve category allotments. These BLM lands are the only habitat areas identified by BLM and ODFW requiring "substantial forage allocations to wildlife". Monitoring of the winter range and future coordination with ODFW could indicate additional areas or forage needs. This could result in changes in allotment or habitat management plans.

7-2 The 1982 grazing use (see Draft RMP/EIS, Appendix F, Table F-1) is representative of the livestock use levels since the drought of 1977. However, there is one notable exception: Murderer's Creek Allotment (No. 4020) has had an average five-year licensed livestock use of 840 AUMs with the remainder of the preference utilized by wildlife and wild horses. That vegetation not consumed allows further improvement in natural values, e.g., riparian habitat.

Winter and summer range for four selected wildlife species is discussed on pages 44 and 45 of the Draft RMP/EIS and the relative amount of habitat on all public lands within the Wildlife Management Units is shown on Map 8. The allocations in the Draft RMP/EIS should meet BLM's share of the ODFW goals.

7-3 A monitoring program will be developed in 1984 with the Record of Decision scheduled for publication in 1985. Based upon past experience of funding monitoring of the effects of livestock use and range improvements, the cost will be estimated \$8,500 to \$25,500 annually. The Bureau has primary responsibility for monitoring, which is normally done with regular personnel, but sometimes by contract or through cooperative agreement.

7-4 Refer to response to comment 15-1 discussing old growth forest.

7-5 There would be 1,280 acres precluded from timber harvest as shown on Tables 2-1 and 2-2 on page 15 of the draft RMP/EIS.

7-6 All range improvements are subject to benefit/cost analyses, which address only those benefits quantifiable in dollars. Enhancement of natural values is a benefit to be considered in project selection, but is not directly applicable to benefit/cost analysis.

7-7 The BLM does not recognize the right of the permittee to treat grazing permits as real property, as stated on pages 57 and 58 of the Draft RMP/EIS.

September 5, 1984

Mr. Larry Morgan, Project Leader
BLM, Burns District
Burns, OR 97720

Dear Mr. Morgan:

Alternative B is preferred by myself and my friends because the environment and natural resources need ALL the protection they can get. This administration and its appointees, this administration and its values puts great store on commercial values and conveniently forgets the environment and natural resources are not given adequate protection. Commercial resources will have no adequate basis and will also disappear. A good example is the way our riparian habitat is disappearing.

Alternative A is preferable to Alternatives B and D but not as good as B.

Yours truly,

Edel W. Thornley and friends

Ms. Edel W. Thornley
18453 Schoenherdt
Detroit, MI 48205



9
UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
ENVIRONMENTAL & TECHNICAL SERVICES DIVISION
847 NE 19th AVENUE, SUITE 350
PORTLAND, OREGON 97232-3519
503.230.5400

September 5, 1984

F/NWRS

Mr. Larry Morgan, Project Leader
Bureau of Land Management
Burns District Office
74 South Alford
Burns, OR 97720

Re: Draft EIS - John Day Resource Management Plan

Dear Mr. Morgan:

We have reviewed the subject DEIS and are in general agreement with its conclusions but suggest the Plan be strengthened to recognize the importance of anadromous fish in the John Day system and the significance of riparian habitat. The John Day system is one of the largest anadromous fish producers remaining in eastern Oregon. It is one of the few systems remaining that produces only wild runs of fish. Three reports highlight the importance of the John Day system and some of the key management issues:

1. Joint Fish and Wildlife Service and National Marine Fisheries Service Preliminary Planning Aid Report - Submitted to the Water and Power Resources Service (2/4/bu).
2. Bureau of Reclamation Preliminary Findings Report, Umatilla Basin Project (BOR 1982).
3. Working Paper, John Day River Basin - Prepared by the Confederated Tribes of the Umatilla Indian Reservation (January 1984).

The John Day river system has chronic problems with low flows, high temperatures, and siltation. Each of the reports mentioned above stresses the importance of riparian zone protection and management in mitigating these problems. We suggest the Resource Plan be strengthened by emphasizing (1) riparian zone protection and management needs (pages 27 and 31), (2) the significance of riparian zone management and the importance of the John Day system as a producer of only wild fish ("Fish" discussion, page 48), and (3) Appendix H, page 115 should be reviewed, as data listed in Table H-1 do not add up to stream mile totals at end of table. Adjusted values may affect text on page 48.

Although the DEIS is generally sound, we feel the anadromous fish portion could be strengthened by addressing the points listed above. Your continuing coordination efforts are greatly appreciated.

Sincerely,

Dale R. Evans

Dale R. Evans
Division Chief

cc: ODFW (Errol Claire, Bob Jubber)



9-1 One of the main objectives of the Preferred Alternative is to maintain or improve range condition, including riparian zones. This would be accomplished through the use of range improvements that provide additional vegetation for other resource needs by either shifting grazing use from problem areas or using fences where needed. If desired resource objectives are not achieved, additional methods or means would be developed and implemented.

9-2 Refer to Chapter 3, Text Revisions for page 115 of the Draft RMP/EIS.



THE WILDERNESS SOCIETY

FOUNDED IN 1935

September 10, 1984

Joshua Warburton, District Manager
Bureau of Land Management
74 S. Alvord St.
Burns, OR 97720

Dear Mr. Warburton:

Thank you for the opportunity to respond to the Draft Resource Management Plan Environmental Impact Statement for the John Day Planning Area. This DEIS is very thorough and informative.

In general, The wilderness Society would prefer Alternative C, the Enhancement Alternative, over the other three alternatives. Alternative C would best protect the Aldrich Mountain WSA as well as resource values in the rest of the Planning Area.

Soils. Timber harvesting is harmful to some soils because of compaction, slides and topsoil removal. Alternative C would allow only 1.32 mm/bf of timber harvest annually; Alternative A, the preferred alternative, would allow 2.17 mm/bf.

Water Quality. water quality would be least under Alternative C. There would be less roadbuilding under the lower timber harvest, hence less sediment in the streams.

Riparian and Wetlands Vegetation. Alternative C would protect perennial streams and their riparian areas from logging; the buffer strips along streams would be three times wider in Alternative C than in Alternative A. Alternative C would prohibit grazing along 76 miles of riparian zone. Alternative A would only "coordinate use" on 28.5 miles of riparian zone.

Wildlife. Both resident and anadromous fisheries would benefit from the summer shade provided by riparian vegetation in Alternative C. Lower amounts of sedimentation would also be beneficial.

0-1 Alternative C calls for the set-aside of over 5000 acres of old-growth forests, whereas Alternative A sets none aside. Elk and other old-growth dependent species would benefit.

NORTHWEST REGION

1424 FOURTH AVENUE, ROOM 822, SEATTLE, WASHINGTON 98101
(206) 624-6430

WCS-108

- 10-1 See response to comment 15-1 regarding old-growth set-aside.
- 10-2 The Aldrich Mountain ACEC nomination originated from the Burns District Office staff. However, an interdisciplinary team evaluation determined that the area did not meet the BLM ACEC criterion for "Importance" (i.e. "qualities of more than local significance and special worth, consequence, meaning, distinctiveness or cause for concern"). In addition, public comments indicated that there was minimal support for designation. BLM and ODF&W specialists determined that the California bighorn sheep herd and its habitat would not be enhanced by special management direction beyond that in the Preferred Alternative.
- 10-3 The proposed management plan places high priority on federal and state land exchanges. Refer to Chapter 3, Text Revisions for page 33 of the Draft EIS.

Raptors need solitude during nesting and breeding seasons. Alternative C specifies that all activity within one-half mile of nesting and breeding sites would be prohibited during crucial periods of the year. Alternative A only restricts activity - * to the sites.

Wild horses are not of concern to The Wilderness Society. They are not native to the area. Furthermore, allowing the herd to increase from 100 to 532, as suggested in Alternative C, might neutralize some of the benefits of the livestock grazing reductions. This is the one element of Alternative C to which we object.

Economics. One aspect of Alternative A worth noting is its cost to the Bureau relative to Alternative C. Range improvements for Alternative A are estimated to cost \$431,000; Alternative C improvements--\$183,000. Furthermore, since Forest Service timber sales east of the Cascades have not been profitable, the higher timber harvest allowed in Alternative A is likely to be a net loss. In case of budget cutbacks, Alternative C would seem to be the more prudent option.

10-2 Aldrich Mountain WSA. The Wilderness Society deplores the Burns District's decision that the Aldrich Mountain WSA not be designated an Area of Critical Environmental Concern, as it deplores the decision of unsuitability for Wilderness designation. The value of this area for big game is recognized in its inclusion in the Murderer's Creek Wildlife Management Area. This area has other wilderness values well worth protection: pure streams flowing into the steelhead habitat of Murderers Creek, rugged scenery, opportunities for solitude.

I have mentioned the general provisions of Alternative C which would protect the Aldrich Mountain WSA. One specific measure is the reduction of AUM's in the Smoky Creek Allotment, which is within the WSA, from 307 to 230. Alternative C's improvements for this allotment include only one reservoir: Alternative A calls for 280 acres of seeding, 200 acres of brush control, 2.5 miles of fence, one spring development and three reservoirs.

10-3 If indeed the configuration of this WSA is such as to make its management as wilderness impractical, we urge that land exchanges be considered with the Malheur National Forest, the Oregon Department of Fish and Wildlife, and private landowners. This area, treasured by conservationists and acknowledged by both the BLM and the Forest Service to have wilderness values, should not remain unprotected because of problems of mixed ownership.

Sincerely,

Janet Lynch

CC: Malheur National Forest
Oregon Department of Fish
and Wildlife
Terry Sopher

Janet M. Lynch, Administrative
Assistant

11



United States
Department of
Agriculture

Soil
Conservation
Service

1220 S. W. Third Avenue
16th Floor
Portland, Oregon 97204

September 10, 1984

Larry Morgan, Project Leader
Bureau of Land Management
Burns District Office
74 South Alvord
Burns, Oregon 97720

We have reviewed your John Day Resource Management Plan Draft Environmental Impact Statement. We agree with your preferred alternative, believing that it will have less adverse impacts than any of the other alternatives on the soil resource. Erosion of the soils in the area are dependent upon the management practices applied and the proposed preferred alternative will cause the least amount of erosion.

We believe you have addressed the environmental impacts properly and have no further comments at this time.

Thank you for the opportunity to review and provide comments on this document.

JACK P. KANALZ
JACK P. KANALZ
State Conservationist



10 Sept 84.

Mr Larry Morgan, Project Leader,
BLM - Burns District Office
74, South Alwood,
Burns, OR., 97720.

Comments on RMP/EIS for John Day P.A.

I find that the EIS does a satisfactory job of describing the current situation and the primary effects of the proposed management alternatives. It is a remarkable achievement considering the budgetary limitations under which it has been produced.

I personally favor Alternative C, the enhancement of natural values, but I realize that the Preferred Alternative may be a more realistic compromise with the desires of the local residents. I do note that Alternative C is considerably less costly than A or B, so that I hope budgetary constraints will cause management to adjust in that direction. I find that the most important interventionist issue is the improvement of streams and riparian conditions to halt the decline in anadromous fish runs. Cows can graze anywhere in the world, but the Northwest Salmon fishery is a unique resource.

Clive Lister

J. R. B. Lister

Monument, Oregon
Sept. 10, 1984

Bureau of Land Management
Burns, Oregon 97720

Dear Sirs:

In regards to the John Day Resource Management Plan, I think the Preferred Alternative is probably the best.

13-1 However, I do have misgivings about any land that is put ~~up~~ for sale. I think it would work a hardship on the ranchers if it was auctioned to the highest bidder. I don't think they would be able to match the bids of outside interests.

I would like to see the land-owners given a chance to buy this land at a fair appraised value & feel that in order for this to happen we would need an appraiser from Eastern Oregon who would know the value of these lands.

Sincerely yours,
George M. Stubbelfield

13-1 The Bureau has discretionary regulation provisions that allow sale of public lands to adjacent landowners at fair market value under specific circumstances.

Larry Morgan, Project Leader
Bureau of Land Management
Burns District Office
74 S. Alvard
Burns, Oregon 97720

RE: JOHN DAY RESOURCE MANAGEMENT PLAN DRAFT EIS

Dear Mr. Morgan:

The following are our general and specific comments on the DEIS.

1. The DEIS falls to plan for 70% of its acreage.

- 14-1 The plan proposes to ignore all but 56,042 of its 183,775 acres. It claims that "available data is insufficient (sic) to warrant changing current forage use" (p.23). However, lack of data is no excuse for failure to manage our public land. Although the plan would like us to believe that the lands they are eliminating from study are small, broken up pieces; unable to be managed, appendix F belies that assumption (p.111). There are 28 allotments in the C or M categories with more than 1,000 acres in them and 7 with more than 3,000 acres. ^{and some of these acreage are} Silvis with 11,035 acres, and Two County's with 13,796 acres. There is no ^{in the world} reason not to include such large acres in the plan. Considering only the fact that no riparian miles are in excellent condition (p.45), there is a need to plan for the management of all the acres.
- 14-2

2. The DEIS does not present a sufficient range of alternatives.

- 14-3 The plan falls to consider any alternative that calls for serious reductions in "tiers of cattle grazed, or for excluding cattle from certain areas. The alternatives listed do not include any provision for increasing forage to wildlife, or restoring grasslands to a more natural state. There is no alternative which considers enhancement of non-game wildlife. There is no alternative that manages all the acres in the planning unit. "M" and "C" category land that comprises more than half the acreage of the unit is not considered in the management plan at

Larry Morgan
September 12, 1984
Page 3

4. Description of the range condition is deceiving.

- 14-8 Nowhere does the DEIS give the reader a "idea of what is actually on the range. How much sagebrush, cheatgrass, juniper, bunchgrass, etc. is in a given area? Further, tables 3-i and P-1 fail to list the climax stage and the corresponding fact that no area surveyed is in climax. This could lead the casual observer to assume that 10% of the area in the planning unit is in the highest vegetation state, when none is. The fact that so much of the acreage is in a degraded condition should be a basis for true reductions in grazing. Yet, grazing will continue at present levels (p.16). There should be a discussion of what condition each allotment is in and how grazing management or reduction can move the range condition to the climax stage.

- 14-9 The discussion of the effects of grazing improvements does not analyze the negative aspects of those improvements. For example, construction of watering holes may degrade further the range condition within reach of those water supplies. Removal of juniper and sagebrush may impact wildlife, fencing riparian zones may limit wildlife access.

5. No alternative sensibly manages for wild horses.

The preferred alternative proposes to reduce the horse management area by 25% of its BLM land. It does this apparently to reduce incidents of horse trespass on private land. However this consideration is "or relevant to the goal of protecting the herd. On the other hand, the enhancement alternative goes to the other extreme of proposing a herd of up to 500 animals. No alternative speaks to the need of improving habitat and eliminating competing cattle grazing to maintain the integrity of the herd. Perhaps then a modest increase in population could be sustained.

- 14-10 ^{See Riparian zone as a priority for future address}
- 14-11 With no riparian zone in excellent condition and 35% in poor condition it is not responsible to aim only for the low beneficial impact of the proposed fencing of streambanks. Grazing cannot be expected to continue at current levels if riparian habitat is expected to improve. There should be consideration of what improvement would be achieved by serious grazing reductions.

all. No alternative presents the choice of no timber production.

3. Elimination of several issues and alternatives was arbitrary.

- 14-4 The "no grazing" (p.22) alternative was eliminated partly because of the cost of fencing all the public land to exclude cattle. Obviously, the elimination of grazing could be substantially achieved by not issuing grazing permits on the larger tracts. The stock owners would be responsible for keeping their animals off the public lands and if that necessitated a fence between U.S. and private land, the private landowner would bear the cost. There is no legal basis on which to claim BLM responsible for fencing cattle out of the public land.

- 14-5 No so called "unconstrained alternatives" (p.23) were seriously considered because it was felt that emphasis on one resource at the expense of other resources would violate the multiple use goals of the BLM. The assumption that many uses must take place on each acre of public land is not what is meant by multiple use. BLM must plan for an area's best use of its resources and sometimes that may mean emphasizing only one value. Of course grazing is now the use that all others are subordinate to, but there is no reason why big game production or fish enhancement or wilderness could not be the primary goal of a particular area. The plan's lack of consideration of such other dominant uses is a major flaw.

- 14-6 Recreation is improperly eliminated from the plan's parameters. Although not identified as a major use in the area (p.23), that use is expected to increase 22% under each alternative considered (p.71). Yet there is no plan for increasing facilities or funding towards improving recreational activities. Even existing campgrounds will not be maintained (p.53). Ignoring recreation after listing all the opportunities to be had for such activities is irresponsible.

- 14-7 Consideration of Aldrich Mountain as a "area of critical environmental concern was eliminated from further study without any satisfactory explanation.

Larry Morgan
September 12, 1983
Page 4

Riparian habitat is so important for other resources it cannot be tolerated in its current miserable state.

6. The economic analysis does not analyze the costs and benefits of grazing permits to the BLM.

- 14-12 With all the study of the economic impacts of grazing of the local economy there is no corresponding study of the cost of grazing permits to the public. At the very least the DEIS should disclose the amount received for grazing fees, the amount spent on administration of the permits, and the money spent on rangeland improvements to benefit the permittees, the public has a right to know if they are getting benefit for their tax dollar

7. Summary.

The plan as a whole is incomplete on its facts and inadequate on its analysis. It fails to consider a range of alternatives, many significant environmental effects are ignored and much data is lacking.

The preferred alternative maintains the status quo, devoting the majority of its emphasis to grazing.

We believe an EIS must do far more than this document does.

Submitted by.

Ellen Mendoza

Charles Landman

- 14-2 The Draft RMP/EIS does not make specific grazing adjustments and does not list specific range improvements on 70 percent of the planning area because these actions are based on selective management. The 56,042 acres that you refer to is the amount of public land in 14 allotments that have been selected for the "Improve" category based on a set of criteria, e.g., range conditions, resource conflicts, economic feasibility of investment and land ownership pattern. Selective management is an ongoing process that can be altered to conform to changing resource needs or conflicts. Additionally, this does not preclude the Bureau from spending money and time within a C category allotment or changing the categorization to an I to resolve problems. Those allotments under the M category are under an existing management plan or system, therefore, uses and objectives have already been planned and at this point need no further input except monitoring.
- Granted, there are a number of C or M allotments containing a total 1,000 acres of public lands or more, but a closer look will reveal a very fragmented pattern of those lands, i.e., Sheep Creek Butte Allotment (No. 4047) containing 2,874 acres of public land comprising 19 percent of the allotment in 16 discontinuous pieces; Cottonwood Forks Allotment (No. 4112) containing 1,558 acres of public land comprising 30 percent of the allotment in 9 discontinuous pieces and Big Flats Allotment (No. 4166) containing 3,637 acres of public land comprising 25 percent of the allotment in 14 discontinuous pieces.
- 14-2 See response to comment 9-1 dealing with riparian habitat.
- 14-3 The Enhancement Alternative C calls for an overall 50 + percent reduction within the I category allotments. Within those reductions there are 3 allotments which would receive no livestock grazing. As indicated on page 67 of the Draft RMP/EIS, non-game wildlife would benefit greatly under that alternative.
- 14-4 Administration of such an endeavor would be very costly regardless of who paid for the fence. Cooperative efforts between BLM and leasees to resolve resource conflicts is the least costly and preferred method, however other actions could be pursued if resolution of conflicts does not occur.
- 14-5 The proposed plan does not attempt to allocate many uses on each acre of public land. There are areas where several uses would be excluded.
- 14-6 Recreation was not identified as an issue in the scoping process and was not considered in this document. Only three major issues were identified as needing evaluation.
- 14-7 See response to comment 10-2 dealing with the Aldrich Mountain ACEC proposal.
- 14-8 See Appendix F of the Draft RMP/EIS for a description of range condition terminology.
- 14-9 Refer to the discussion on page 64 (including Table 4-3) and on page 68 of the Draft RMP/EIS. Also refer to page 99, Appendix B, Range Developments.
- 14-10 Alternative C would eliminate livestock grazing on public land within the horse herd management area and thus provide more forage for these horses.
- 14-11 Refer to response 9-1 which deals with riparian areas.
- 14-12 In 1982 and 1984 the grazing fees were \$1.86 and \$1.37 per AUM, respectively. Under grazing administration of Section 15, grazing lands (Taylor Grazing Act, outside of grazing district), grazing receipts are equally divided; 50 percent going to the U.S. Treasury and 50 percent going to the county in which it was derived. No figures have been calculated for lease administration or development of all existing range improvements within the RMP area. The cost per alternative is on Table 1, page VII of this document.



AUDUBON SOCIETY OF PORTLAND

A Branch of National Audubon Society

PHONE 292 6855

5151 NORTHWEST CORNELL ROAD

PORTLAND OREGON 97210

September 13, 1984

Mr. Larry Morgan
Project Leader
Bureau of Land Management
74 S. Alvord
Burns, Oregon 97720

Dear Mr. Morgan:

We'd like to express concern with the adequacy of the John Day Resource Management Plan Environmental Impact Statement. We'd also like to propose that you revise your preferred alternative. The preferred alternative does not begin to take a "middle-ground" approach between natural and commodity values. Our specific comments follow:

Forest Management

15-1

The draft doesn't adequately describe the environmental impact of saving no old-growth on BLM lands. The enhancement alternative sets aside 2,157 acres. As you mention on p. 48, some animals are dependent on big, old trees. Plant species, too, are uniquely associated with these forests. Specifically, how will the preferred alternative affect them? Where is the old growth? Is it adjacent to other tracts? Is it one parcel or several small ones? Without the answers to these questions, how can you assess the impact of harvesting the old growth?

Riparian Protection

Given the importance of riparian areas to wildlife and given that the bulk of riparian habitat is in poor or fair condition, we think that the preferred alternative should do more to improve these areas. We favor the enhancement alternative, alternative c, for multiple-use set asides in forested lands and alternative c, riparian management for grazing management direction.

Riparian areas are critical wildlife habitat. The preferred alternative plans protection against livestock by grazing management and fencing. We know that you assume that you will have enough money to complete these projects, but that assumption hasn't always been valid in the past. Removing the cows from streams is cheaper, surer, and more effective.

Wild Horses

We are sorry that wild horse increases are included in the enhancement alternative. Because wild horses are not native species, their management should be a separate issue in the final EIS. We do not favor increases in the size of wild horse herds.

Mr. Morgan
Page 3

Mid-Ground Approach

The draft says that the preferred alternative is a mid-ground approach between production and enhancement alternatives. We would like to see a better balance. Preferred seems very close to production on most measures: acres to be seeded, ALMs, timber sales, cost of grazing improvements, etc.

When wildlife habitats and stream habitats for fish are judged poor or fair in most of the planning unit, we can't afford another 10 to 15 years of a preferred alternative which continues to short change multiple use.

Thank you for the opportunity to comment.

Sincerely yours,

Linda S. Craig
Linda S. Craig
for the Conservation Committee,
Audubon Society of Portland

Mr. Morgan
Page 2

Fisheries

Given the value of the John Day fisheries resource and the low habitat quality ratings for streams in the Basin, the preferred alternative should be a lot closer to the enhanced alternative for fishery management. You say anadromous fish are declining, yet you prefer grazing management which has an adverse impact on fish populations.

15-2 You plan to improve fisheries habitat not by reducing grazing, but by fish-enhancement projects. Projects are always second best to natural restoration of habitat. Again, will you have the money to complete the projects? What will they cost? How much improvement will there be? What is the cost-effectiveness of the preferred approach over removing the cows from streams?

15-3 We do not favor rip-rap as erosion control because it spoils riparian habitat for other wildlife. What is the environmental impact of the proposed rip-rap projects?

Grazing Management

15-4 We understand that BLM's ownership is patchy in much of this planning unit, but it seems, nonetheless, that you don't know much about the range condition of over half of the grazing lands covered in the EIS. We counted 23 parcels in Appendix F of over 1,000 acres each, 5 parcels of over 3,000 acres, on which you have no range data. Your management of more than half of the total allotted acreage is custodial. Are these 95,000+ acres being managed for multiple use? Is their condition improving? Shouldn't some attempt be made over time to find out?

15-5 What is the environmental impact on non-game species of the range improvements you propose? Few birds use crested wheat seedlings for nesting. This draft is to double as a grazing EIS, but we see no analysis of the impacts of each of the different types of "improvements" you propose.

Land Ownership

15-6 We don't understand from reading the draft why you are considering any land sales. Are the lands to be sold serving multiple use purposes? What damage is done by keeping them in public ownership? What does it cost to manage them? What would be gained by the sale? Again, we prefer alternative c, no land sales.

Cost-Effectiveness

15-7 Page 8 says the decision criteria are considered in a cost-effective manner. We think you need to do more cost-benefit analyses in the final EIS.

For example, range improvements in the preferred alternative cost \$431,000. What is the cost breakdown of the various improvements? What is the benefit of each type of improvement? Where will they be applied? Who will benefit?

We have asked similar questions about the proposed fish projects above.

15-1 There are 117 individual tracts of old growth scattered throughout the planning area. Within the Preferred Alternative there would be 530 acres of old growth under the "No Planned Timber Harvest" of which 488 acres are within the Aldrich Mountain WMA (in 6 separate tracts).

15-2 Natural restoration is normally best, provided it would occur in a reasonable timeframe. In this case, substantial aquatic habitat is in such a degraded condition that natural recovery would be very slow and upstream influences have a great impact on downstream aquatic habitat condition. Therefore, removal of livestock grazing may upgrade the condition class somewhat, but not to its potential without habitat improvement projects. A conservative estimate of projected costs for instream habitat developments on public land in the John Day watershed is \$1,680,000. It is anticipated that some of these costs can continue to be funded by EPA under authority of the Northwest Power Planning Act of 1980. Investments to date are approximately as follows: BLM - \$187,500 (instream structures), \$15,200 (fences); ODFW \$10,000 (instream structures), \$3,000 (fences) and EPA contracts \$41,100 (instream structures). Instream habitat developments include rock (jetties) and log deflectors, boulder placement, rock riprap, bank stabilization by juniper and log sills.

15-3 The placement of this type of riprap has no parallel to the more familiar riprap and gabions used along large rivers and highways. The stone size the Burns District uses for riprap and jetty construction usually grades out approximately 2 feet minus. At that grade the riprap material contains a lot of rubble and soil which aids in quick vegetation. Usually a healthy stand of grass and forbs is established in the first year. In subsequent years brush and tree (willow and alder) species develop and are protected from high runoff by the riprap.

15-4 See response to comment 14-1. Those tracts within the I and M category allotments that have not been inventoried would be inventoried on a case-by-case basis based upon need. The Bureau is looking at remote sensing as a way to obtain data and monitor trends on those lands that are too scattered to reach on any regular basis on the ground.

15-5 Refer to Chapter 3, Text Revisions, page 68 and Draft RMP/EIS, Appendices B and C, pages 99 to 104. Most seedings will be 300 acres or less and irregularly shaped to provide edge effect and minimize impacts on wildlife species.

15-6 Those lands identified for sale typically are serving limited multiple use purposes which would not be expected to change if the ownership changed, since the surrounding private lands receive the same limited use. Refer to Draft RMP/EIS, Appendix K, criteria for retention or disposal.

15-7 Refer to Appendix B in this document for benefit/cost analysis.

Public Lands

September 11, 1984

Mr. Larry Morgan
Project Leader
Bureau of Land Management
Burns District Office
74 So. Alvorn street
Burns, Oregon 97720

RE: John Day RMP-Oregon

Dear Mr. Morgan:

We appreciate the opportunity to comment on the Draft John Day RMP/EIS. Overall we agree with the intent of the preferred alternative.

However, we suggest that the final document contain maps that more clearly delineate the management prescriptions for the Resource Area. We agree that minimal or no constraints on exploration and development of mineral and energy resources are needed. Yet, we note that there will be some wildlife stipulations and probably other stipulations depending on the type of activity and their location in the area. We would like to see language in the final document that would assure that the mineral estate will be treated at least on an equal footing with other resource values if user conflicts arise.

Management plans are issue driven. The John Day resource area has known mineral potential. The final plan should address minerals as an issue in a concrete and equitable way.

16-1 We believe the inclusion of a mineral issue should answer the following:

How the BLM will gather information in order to adequately evaluate the energy and mineral potential within the Resource Area; and

How the BLM has developed land use allocations compatible with possible exploration for, and development of minerals and oil and gas resources where they occur.



Mr. Larry Morgan
September 11, 1984
Page 2

16-2 In order to aid this process we suggest the Bureau use the matrix rating system developed by Rocky Mountain Oil & Gas Association (RMOGA) which fulfills the intent and purpose of the draft BLM resource guidelines.

Again, we appreciate the opportunity to submit our comments to the BLM on this important Resource Area. If you have any questions, please contact us.

Sincerely,


Peter B. Briggs

ARCO 6144

16-1 Minerals management was not identified as an issue in the scoping process and therefore not considered in this document. Only three major issues were identified as needing evaluation.

16-2 A minerals data base does not exist which would allow use of this system at this time. At present the only site within the planning area which has substantial minerals management restrictions due to conflicts with other resources is the Aldrich Mountain WSA.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Division of Ecological Services
Portland Field Office
727 N. E. 24th Avenue
Portland, Oregon 97232

Reference CC:MM

September 12, 1984

MEMORANDUM

To : Burns District Manager, Bureau of Land Management
From : Field Supervisor, Division of Ecological Services
Portland, Oregon
Subject: Review of the John Day Resource Management Plan, Draft
Environmental Impact Statement

We have reviewed the subject draft environmental statement on the John Day Resource Management Plan and provide the following comments.

Based upon the information presented in the subject document and depending upon the alternative selected, implementation of the proposed management plan could have adverse impacts on the area's fish and wildlife resources. The extent of those impacts are not adequately identified in the draft statement; especially for anadromous and resident fish. In addition, the document does not clearly define possible impacts to wetlands.

17-1 The statement should clearly identify the impacts each alternative would have on fish and wildlife resources (populations and habitats) and wetlands. The final document should also specifically define the impacts of grazing on fish and wildlife resources.

17-2 It is our belief that proper guidelines and selected mitigative measures should be incorporated into any comprehensive plan that you subsequently adopt. The final document should also consider all practicable means and measures that could best satisfy identified needs while at the same time protecting, preserving, and enhancing the quality of the environment, restoring environmental quality previously lost, and minimizing and mitigating unavoidable adverse effects. We are especially concerned about maintaining a reasonable riparian buffer strip in association with each stream corridor. Also, bank protection is important in helping to reduce potential sedimentation and temperature increases.

17-3 The statement should clearly identify the impacts each alternative would have on fish and wildlife resources (populations and habitats) and wetlands. The final document should also specifically define the impacts of grazing on fish and wildlife resources.

We appreciate having had the opportunity to review this draft. Please feel free to contact us if you have any questions concerning our comments. We would also appreciate receiving a copy of the final statement when it becomes available.

Russell D. Peterson
Russell D. Peterson

- 17-1 The 900 acres of wetlands on BLM lands are located in Silvian Valley (see page 47 of the Draft EIS). This area is within a Maintain category allotment and under an existing Coordinated Resource Management Plan. The management direction would remain essentially unchanged under all alternatives, maintaining current conditions. However, development and implementation of a wetland habitat management plan will lead to wetland habitat improvements. Additionally, wetlands would be excluded from range developments and timber harvesting practices.
- 17-2 Refer to Table 4-5 Estimated Population Changes in Selected Wildlife by Alternative, page 68 of the Draft EIS.
- 17-3 Management direction has been outlined in Draft EIS on Table 2-6, Management Direction by Alternative, pages 29 to 34 and standard operating procedures, mitigative measures and avoidance areas are discussed in Appendices B, C, D, E, G and J.

18



United States
Department of
Agriculture

Forest
Service

Malheur
National
Forest

139 NE Dayton Street
John Day, OR 97845

From: 1950

Date: September 14, 1984

Joshua L. Warburton
Bureau of Land Management, Burns District
745 Alvord Street
Burns, OR 97720

Dear Mr. Warburton:

Thank you for the opportunity to review your John Day Resource Management Plan E.I.S. Our comments are provided as input to your draft statement so as to assist in developing the final management plan.

18-1 The Forest will not be addressing the wilderness question for the Aldrich Mountain and Dry Cabin Roadless areas. The passage of the Oregon Wilderness Act of 1984 on June 26, 1984, removed this necessity from the planning process. We will be reviewing these areas for resource uses other than wilderness in the alternative development depending on the issues being answered.

Chapter II - The preferred alternative does not specifically discuss the fish ladder at the Isaac Falls; but, in the summary, mention is made of the fish ladder. The construction of this fish ladder would have the potential of opening up some 60 miles of stream on the Forest to anadromous fish. Much of the main stem and the lower reaches of these streams are through hay meadows where the riparian habitat is not always the best for anadromous fish rearing. This will require an increase in riparian management for these streams.

18-2 There were discussions about 2 years ago which would reduce the Murderers Creek wildhorse herd management area by about 40,000 acres. This proposal removed the area west of the South Fork John Day River and the southern portion (Indian, Morgan, Poison, Rosebud, and Tamarack Creeks area) of the area. This removes a large amount of private land from the territory and would allow the unit to still carry the 100 horses (see enclosed map). Your proposed area reduction would remove a large amount of horse winter area from the territory and would make it impossible to winter the 100 horse herd.

Mr. Joshua Warburton

2

We are not in favor of Alternative C which would allow the horses to increase to such levels.

Herd improvement by introduction of horses from other herds cannot be done under current Forest Service policy.

18-3 Land transfer - In areas where BLM lands are bordered on three sides by Forest Service lands, they should be considered for immediate transfer in order to save money and administrative time. Lands adjacent to the Forest would usually be a low priority for administrative transfer.

If you have any questions concerning this response, please contact Chet Bennett of my staff.

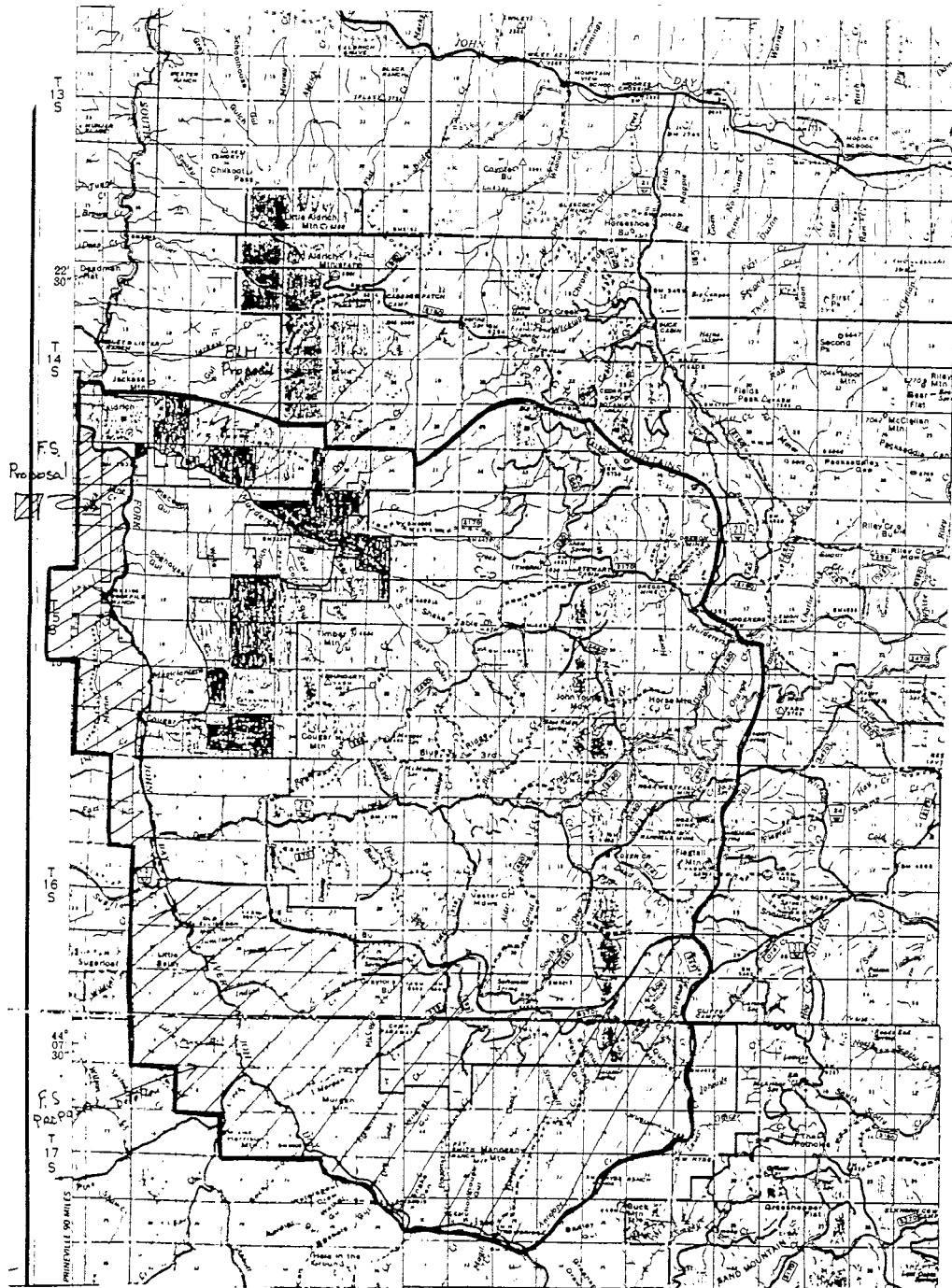
Sincerely,

Kenneth L. Evans
KENNETH L. EVANS
Forest Supervisor

Enclosure

- 18-1 Refer to Chapter 3 Text Revisions for page 9 of Draft EIS.
- 18-2 There would be 240 AUMs allocated for wild horse use within the proposed herd management area. Available data indicates that wild horse use can be satisfied within the proposed herd management area.
- 18-3 See response to comment 10-3.







OREGON HUNTER'S ASSOCIATION

PO Box 6616, Bend, Oregon 97708 • (503) 382-4038

(2150 N.E. Division, Suite 1, Bend, OR 97701)

June 8, 1984
P.O. Box 6616
Bend, OR 97708

Dear Mr. Warburton:

I am writing to you regarding the Oregon Hunter's Association's comments on the John Day Resource Management Plan EIS.

Thank you for the opportunity to comment on the John Day Resource Management Plan EIS.

After reviewing the document, Oregon Hunter's Association would like to express the following concerns:

1. The preferred and even the enhancement alternatives call for no change in present suppressed mule deer populations in the planning area in the short term. Only one call for a slight increase in the long term. This allows for little if my flexibility in management prescriptions to increase mule deer herds. The same can be said for elk. While most of the BLM land within the planning area is marginal elk habitat, a "No Change" does not allow for increased populations to wet future user demands. Language should be incorporated in the final alternative to allow for a "Plus P" designation, especially for mule deer, and subsequent practices be implemented to meet the goal. Few can be content with present low mule deer numbers and the plan, at present, does not allow for a sufficient increase.
2. Similarly, there seems to be quite a disparity in allocated AUM's between wildlife and cattle. Only 500 AUM's would be allocated to deer, elk, and antelope, 360 to bighorn sheep under all the alternatives, while at least 21,000 AUM's are to be allocated to cattle in all the alternatives. Will 500 AUM's be enough to accommodate present and future mule deer, elk, and antelope populations? Will 360 AUM's accommodate a projected increase in bighorn use? At the same time, while reviewing Table 2, it shows plus designations for the commodities in all the alternatives except for two cases, and minus designations or NC designations for wildlife in all the alternatives except for two cases. Clearly, this shows a slighting of the wildlife resource, when present statutes demand true multiple use of all the resources.
3. All of the alternatives except "C" do not give enough protection to riparian habitat. The final alternative should provide more protection to the sensitive and highly critical riparian zones in the RMP.
4. There seem to be a need to get a better balance between reasonable goals in the

20-1

See response to comment 7-1.

Present ODFW objectives are for a population level of 150 Bighorn sheep for the Aldrich Mountain area. The Bighorn habitat is contained within two allotments (No. 4020 and No. 4124.) Use levels would amount to 1,800 Bighorn sheep unit months annually. Based on Bighorn sheep unit months for 1 AUM, we would provide in the long term 360 AUMs for Bighorn sheep as shown in Table 1 of the DEIS.

Page 2
Joshua L. Warburton
September 13, 1984

alternatives. For example, the enhancement alternative which puts an average moderate emphasis on wildlife - at the same time - puts a very high emphasis on wild horses. Wild horses and wildlife are not regarded together in the same high light as some would have managers believe. The Oregon Hunter's Association recommends that wild horses be maintained only at levels to meet federal law requirements, and not more. Wild horses, if not contained, are a detriment to the range, important water sources, and sensitive wildlife habitat. The two are not one and the same, and should not be construed to be compatible.

In conclusion, we would hope that the final alternative reflects a much higher emphasis on the wildlife resource to allow for present and future demands of the citizens of Oregon. Your consideration is most genuinely appreciated.

Sincerely,
Neil Rodgers
Neil Rodgers, Executive Director
Oregon Hunter's Association

NR/clp

September 13, 1984

Joshua L. Warburton, District Manager
Burns District BLM
74 South Alford St.
Burns, OR 97720

Dear Mr. Warburton:

Thank you for the opportunity to comment on the John Day Resource Management Plan EIS. After reviewing the document, Oregon Hunter's Association would like to express the following concerns:

1. The preferred and even the enhancement alternatives call for no change in present suppressed mule deer populations in the planning area in the short term. Only one call for a slight increase in the long term. This allows for little if my flexibility in management prescriptions to increase mule deer herds. The same can be said for elk. While most of the BLM land within the planning area is marginal elk habitat, a "No Change" does not allow for increased populations to wet future user demands. Language should be incorporated in the final alternative to allow for a "Plus P" designation, especially for mule deer, and subsequent practices be implemented to meet the goal. Few can be content with present low mule deer numbers and the plan, at present, does not allow for a sufficient increase.
2. Similarly, there seems to be quite a disparity in allocated AUM's between wildlife and cattle. Only 500 AUM's would be allocated to deer, elk, and antelope, 360 to bighorn sheep under all the alternatives, while at least 21,000 AUM's are to be allocated to cattle in all the alternatives. Will 500 AUM's be enough to accommodate present and future mule deer, elk, and antelope populations? Will 360 AUM's accommodate a projected increase in bighorn use? At the same time, while reviewing Table 2, it shows plus designations for the commodities in all the alternatives except for two cases, and minus designations or NC designations for wildlife in all the alternatives except for two cases. Clearly, this shows a slighting of the wildlife resource, when present statutes demand true multiple use of all the resources.
3. All of the alternatives except "C" do not give enough protection to riparian habitat. The final alternative should provide more protection to the sensitive and highly critical riparian zones in the RMP.
4. There seem to be a need to get a better balance between reasonable goals in the



REPLY TO
ATTN OF M/S 443

SEP 21 1984

Joshua L. Warburton, District Manager
Burns District Office
Bureau of Land Management
74 South Alvord Street
Burns, Oregon 97720

Dear Mr. Warburton:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Draft Environmental Impact Statement (DEIS) for the John Day Resource Management Plan in Eastern Oregon. The plan discusses resource management on 182,120 acres of public lands administered by the Bureau of Land Management.

21-1 The DEIS indicates that adverse water quality impacts from the preferred plan are expected in terms of increased sediment from livestock grazing, timber harvesting, road construction, mining, and oil and gas exploration/development. We would recommend that the Final EIS indicate whether the preferred plan will allow Oregon Water Quality Standards to be exceeded. If so, the DEIS should describe the mitigative measures that will be used to prevent water quality standard violations.

Based on our review, we have rated this DEIS LO-1 [LO: Lack of Objections; 1: Adequate Information] in accordance with our responsibility under Section 309 of the Clean Air Act to determine whether the environmental impacts of proposed major Federal actions are acceptable in terms of public health, welfare and environmental quality.

We appreciate the opportunity to review this report. Should you want to discuss EPA's comments, please contact Richard R. Thiel, Environmental Evaluation Branch Chief, at (206) 442-1728 or (FTS) 399-1728.

Sincerely,

Robert S. Burd
Director, Water Division

Appendices

Appendix A

Opportunities for Sale of Public Lands in the Proposed Plan

State: Oregon
District Office: Burns
County: Grant
As of: March 25, 1983

Willamette Meridian

Legal Description

Legal Description	Total
T. 7 S., R. 26 E.,	
Sec. 15: W $\frac{1}{2}$ NE $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$	160
Sec. 23: W $\frac{1}{2}$ NW $\frac{1}{4}$	80
	240
T. 8 S., R. 29 E.,	
Sec. 22: SW $\frac{1}{4}$ SE $\frac{1}{4}$	40
Sec. 27: NW $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$	280
Sec. 35: NW $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$	80
	400
T. 8 S., R. 30 E.,	
Sec. 20: SW $\frac{1}{4}$ NW $\frac{1}{4}$	40
T. 9 S., R. 28 E.,	
Sec. 22: E $\frac{1}{2}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$ NE $\frac{1}{4}$	120
Sec. 34: NW $\frac{1}{4}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$	80
	200
T. 9 S., R. 29 E.,	
Sec. 21: SE $\frac{1}{4}$ NE $\frac{1}{4}$	40
Sec. 30: N $\frac{1}{2}$ SE $\frac{1}{4}$	80
Sec. 31: E $\frac{1}{2}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$	160
	280
T. 9 S., R. 32 E.,	
Sec. 18: SW $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$	80
Sec. 27: SE $\frac{1}{4}$ SW $\frac{1}{4}$	40
	120
T. 10 S., R. 29 E.,	
Sec. 1: SE $\frac{1}{4}$ NE $\frac{1}{4}$	40
T. 10 S., R. 30 E.,	
Sec. 21: NE $\frac{1}{4}$ SE $\frac{1}{4}$	40
Sec. 32: NE $\frac{1}{4}$ NW $\frac{1}{4}$	40
	80
T. 10 S., R. 31 E.,	
Sec. 21: NW $\frac{1}{4}$ NE $\frac{1}{4}$	40
T. 11 S., R. 29 E.,	
Sec. 29: SW $\frac{1}{4}$	160
Sec. 30: NW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$	80
Sec. 32: NW $\frac{1}{4}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$	80
	320

Legal Description

Legal Description	Total
T. 12 S., R. 27 E.,	
Sec. 2: SW $\frac{1}{4}$ SE $\frac{1}{4}$	40
Sec. 3: SE $\frac{1}{4}$ SE $\frac{1}{4}$	40
	80
T. 13 S., R. 31 E.,	
Sec. 28: S $\frac{1}{2}$ S $\frac{1}{2}$	160
T. 14 S., R. 31 E.,	
Sec. 28: SE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$	200
Sec. 32: SW $\frac{1}{4}$ SW $\frac{1}{4}$	40
	240
T. 17 S., R. 26 E.,	
Sec. 17: NW $\frac{1}{4}$ NE $\frac{1}{4}$	40
Sec. 20: NW $\frac{1}{4}$ SW $\frac{1}{4}$	40
Sec. 22: SE $\frac{1}{4}$ NW $\frac{1}{4}$	40
Sec. 25: E $\frac{1}{2}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ SE $\frac{1}{4}$	120
Sec. 29: SE $\frac{1}{4}$ NE $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, W $\frac{1}{2}$ NW $\frac{1}{4}$	200
Sec. 30: SE $\frac{1}{4}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ SE $\frac{1}{4}$	160
Sec. 31: W $\frac{1}{2}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ SE $\frac{1}{4}$	160
Sec. 32: NW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ SW $\frac{1}{4}$	120
	800
T. 17 S., R. 27 E.,	
Sec. 30: SW $\frac{1}{4}$ NW $\frac{1}{4}$, W $\frac{1}{2}$ SW $\frac{1}{4}$	120
Sec. 31: W $\frac{1}{2}$ W $\frac{1}{2}$	160
	180
T. 18 S., R. 26 E.,	
Sec. 1: S $\frac{1}{2}$ SE $\frac{1}{4}$	80
Sec. 4: NE $\frac{1}{4}$ SW $\frac{1}{4}$	40
Sec. 5: NW $\frac{1}{4}$ NW $\frac{1}{4}$	40
Sec. 8: NE $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ SW $\frac{1}{4}$	80
Sec. 9: S $\frac{1}{2}$ S $\frac{1}{2}$	160
Sec. 10: S $\frac{1}{2}$ SW $\frac{1}{4}$	80
Sec. 12: S $\frac{1}{2}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$	240
Sec. 13: N $\frac{1}{2}$ NW $\frac{1}{4}$	80
Sec. 17: W $\frac{1}{2}$ NW $\frac{1}{4}$	80
Sec. 19: NE $\frac{1}{4}$ SE $\frac{1}{4}$	40
Sec. 21: SW $\frac{1}{4}$ NE $\frac{1}{4}$	40
Sec. 25: N $\frac{1}{2}$ NW $\frac{1}{4}$	80
Sec. 26: SE $\frac{1}{4}$ NE $\frac{1}{4}$	40
Sec. 28: S $\frac{1}{2}$ SE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NE $\frac{1}{4}$	200
	1,280
T. 18 S., R. 27 E.,	
Sec. 2: SW $\frac{1}{4}$ SW $\frac{1}{4}$	40
Sec. 10: SW $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$	80
Sec. 11: S $\frac{1}{2}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$	240
Sec. 12: S $\frac{1}{2}$ N $\frac{1}{2}$	160
	520
T. 20 S., R. 32 E.,	
Sec. 9: SE $\frac{1}{4}$ SE $\frac{1}{4}$	40

Grand Total 5240

Appendix B

Proposed Range Improvement and Benefit/Cost

Each allotment's proposed range development program was subjected to a Rangeland Investment Analysis. This analysis process was used to design and evaluate the economic efficiency of various combinations of range improvements and management actions. All potential range development proposals (see Draft RMP/EIS, Appendix B, Table B-1) were subjected to this analysis. Further refinements and details will be shown in the Record of Decision scheduled for publication in 1985.

Allotment Number and Name	Benefit/Cost	BLM internal Rate of Return
4007 Windy Point	1.2/1	11.2
4049 Battle Creek	1.0/1	9.3
4052 Big Baldy	1.1/1	9.7
4068 Sheep Gulch	1.0/1	10.4
4086 Rudio Mountain	1.2/1	30.5
4097 Trout Creek	1.0/1	9.4
4098 East Creek-Pine Hill	2.0/1	17.3
4103 Rockpile	1.8/1	15.6
4120 Ferris Creek	1.0/1	9.5
4124 Smokey Creek	1.0/1	9.7
4151 Kinzua ¹	N.A.	N.A.
4156 Rudio Creek	7.0/1	56.8
4163 Creek	N.A.	N.A.
4164 Corral Gulch	2.9/1	23.8

¹No Improvements are proposed at this time. Results of monitoring may indicate opportunities for additional improvements.

